



# SESEC V

## China Standardisation Newsletter

March - April 2025



Seconded European Standardisation Expert in China  
(SESEC)

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# Takeaways

## Online Meeting Between CEN-CENELEC and China Battery Industry Association Regarding Battery Passport Standards

On April 1, 2025, the European Committee for Standardization and European Electrotechnical Committee for Standardization (CEN-CENELEC), the Seconded European Standardization Expert in China (SESEC), together with the German Commission for Electrical, Electronic and Information Technology (DKE) participated in an online meeting organized by China Battery Industry Association (CBIA). Established in 1988 with the approval from the Ministry of Civil Affairs of People's Republic of China, CBIA is a national industrial social organization voluntarily formed by enterprises, institutions and individuals from the battery industry and related field. During the meeting, CEN-CENELEC and CBIA exchanged updates on their respective standardization efforts regarding digital battery passports.

## The 2025 Government Work Report: More Standardization Content Enters the Highest Decision-Making Agenda

On March 5, 2025, during the "Two Sessions," Premier Li Qiang delivered the 2025 Government Work Report to the National People's Congress, in which the term "standards" appeared eight times (directly related to standardization work), an increase of three mentions compared to the 2024 report. This reflects a rising emphasis on standardization in the top-level policy agenda. SESEC has observed three major trends related to standardization by comparing 2024 and 2025 version of the report.

## SAMR Released its Legislative Work Plans for 2025

On March 21, 2025, the State Administration for Market Regulation (SAMR) released its key legislative plan for 2025, aiming to promote high-quality social development. The work plan outlines 27 legislative items to be revised or formulated throughout the year, including 3 laws, 10 regulations, 11 administrative measures, and 2 provisions. These items can be categorized into five key areas, among which the quality development aspect is standards related.

## China Seeks Public Opinions on the Second Amendment to Cybersecurity Law

On March 28, 2025, the Cyberspace Administration of China (CAC) released a draft amendment to the Cybersecurity Law (hereinafter referred to as the "amendment") for public consultation. The amendment aims to coordinate with China's evolving policy focus on enhancing its national security legal framework and strengthening the institutional capacity in the cybersecurity sector. Its objectives are to build a more unified and coordinated legal liability system, fill existing regulatory gaps, clarify implementation mechanisms, and define clear safety baselines and risk thresholds. Changes occur in Chapter Six of the Cybersecurity Law which is about legal liability. The 2025 amendment follows 4 key lines of logic.

## China Reconfirmed International Standards as ISO/IEC/ITU Standards

On March 25, 2025, the State Administration for Market Regulation (SAMR) revised and issued the **Administrative Measures for Adopting International Standards** (hereinafter referred to as "the Measures") which will take effect on **June 1, 2025**. In the Measures, it has reconfirmed that international standards are those published by the three major international standardization organizations: **ISO, IEC, and ITU**.

## Revision 'Administrative Provisions on National Standardization Guiding Technical Document' Published

On April 7, 2025, the Standardization Administration of China (SAC) officially issued the revised **Administrative Provisions on National Standardization Guiding Technical Documents** ("Provisions"), which came into effect immediately. These Provisions introduce significant updates to China's standardization framework, particularly designed to support the rapid development of innovative technologies that are not yet mature enough to be formalized into national standards. This new regulatory approach aims to broaden the transformation channels for technological achievements, diversify the types of standardized deliverables, and accelerate the deployment of innovative standards to promote high-quality industrial development. The guiding technical documents are positioned as a critical supplement to the national standards system, bridging the gap between early-stage

technological innovation and the formal standardization process.

### **China Issued New Mandatory National Standard and Measures for the Labeling of Content Generated by Artificial Intelligence**

On March 14, China released *Measures for the Labeling of Content Generated by Artificial Intelligence* (hereinafter referred to as “the Measures”). The Measures are jointly developed and issued by the Cyberspace Administration of China (CAC) and the Ministry of Industry and Information Technology (MIIT) and will take effect on September 1, 2025.

### **China Releases Its First Security Management Measures on the Application of Facial Recognition Technology**

On 21 March 2025, the Cyberspace Administration of China (CAC) and the Ministry of Public Security jointly released *Security Management Measures for the Application of Facial Recognition Industry* (hereinafter referred to as “the Measures”). This is China’s first set of legally binding rules applicable to facial recognition technology (FRT) and will take effect from **June 1, 2025**. The Measures stipulate the general processing rules and requirements for using FRT to handle facial information, security norms for the application of FRT, and responsibilities for supervision and management.

### **New Mandatory Standards for China RoHS Near Completion**

Beijing, March 14, 2025 - China is one step closer to formalizing its first mandatory national standard on hazardous substance restrictions in electrical and electronic products (EEPs). A technical review meeting for the draft standard, titled “*Requirements on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Products*” (Plan No. 20231685-Q-339), was recently held 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.

### **CNCA Issued First General Implementation Rules for Product Carbon Footprint Labeling Certification**

On March 20, the National Certification and Accreditation Administration of China (CNCA) issued the General Implementation Rules for Product Carbon Footprint Labeling Certification (Trial) (hereinafter referred to as the “General Implementation Rules”), which is the country’s first systematic document on product carbon footprint labeling certification and has taken effect from the date of issuance. The document is applicable to products falling under the catalogue of the [product carbon footprint labeling certification’s pilot program](#) published by CNCA in 2024, while other products may use the General Implementation Rules as a reference for their own labeling certification activities.



# Activities Supported by SESEC

## 1. SESEC Expert Attended ‘China Standardization Magazine’ Editors Meeting

#Standardization Event

On March 24, 2025, the Editorial Board Meeting of China Standardization Magazine was held at the China National Institute of Standardization (CNIS). Attendees included Mr. Zhang Xiaogang, former President of the International Organization for Standardization (ISO); Mr. Luo Fangping, Secretary of the Party Committee and President of CNIS; CNIS Vice Presidents Ms. Li Aixian and Ms. Lu Lili; and Ms. Zhang Xiuchun, Secretary-General of the China Association for Standardization. Representatives from the Publicity Department of the State Administration for Market Regulation (SAMR) attended the meeting and delivered remarks. The meeting was chaired by CNIS Vice President Mr. Li Zhiping. SESEC Expert Dr. Betty Xu, as one of the editorial board members, participated in the meeting.



Mr. Zhang Xiaogang analyzed the current trends in international standardization and the opportunities and challenges China faces amid rapid development. He emphasized that:

- Greater attention should be paid to the field of social governance in international standardization, leveraging standard internationalization to contribute China’s governance experience.
- Emerging business models require adaptation, with the “standards before products” approach

to be actively applied in future industrial competition.

- The development and application of intelligent standardization technologies should be accelerated, encouraging bold innovation in digital and smart standardization.
- The current period presents an optimal opportunity for China’s standardization development. The magazine should continue to improve content quality, expand its influence, and strive for high-quality growth.

In her remarks, Ms. Zhang Xiuchun stated that the magazine has always adhered to the core mission of serving the country, society, industry, and readers, making an indelible contribution to the advancement of China’s standardization efforts. In facing new challenges and opportunities, the magazine must respond proactively by strengthening internal management, remaining confident, embracing innovation, and continuing to operate under market-oriented principles—remaining aligned with readers’ and market needs. As a co-sponsor, the China Association for Standardization will continue to strongly support the magazine and work with all editorial board members to build a leading standardization communication platform.

Mr. Luo Fangping fully affirmed the magazine’s achievements in standardization outreach and the vital role the editorial board has played in its development. He emphasized that standardization is a systematic undertaking that is crucial to national development and social progress. As a key communication channel, the magazine shoulders the important mission of spreading ideas, driving innovation, and serving society.

The meeting also included a report by Ms. Wu Jinhui, President of the magazine, summarizing the publication’s recent activities and outlining the work plan for 2025. During the thematic discussion session, Mr. Wang Yanfeng, Chairman of China Standard Science and Technology Group, led the editorial board members

in discussing how to enhance the magazine's high-quality development and nurture it into a core academic journal.

More than 40 editorial board members from institutions including CNIS, the Chinese Academy of Sciences, the National Institute of Metrology, the HydroChina Huadong Engineering Corporation, the China Academy of Urban Planning and Design, China Standards Press, Tsinghua University, China Jiliang University, Huawei Technologies Co., Ltd., ZTE Corporation, and Tencent Technology (Beijing) Co., Ltd. attended the meeting.



**China Standardization Magazine** is a leading journal in the field of standardization, sponsored by China Standardization Press and supervised by the State Administration for Market Regulation (SAMR). Established in 1979, the magazine serves as an authoritative source for policy interpretation, standardization updates, and best practices both in China and internationally. It covers a wide range of topics including quality infrastructure, national and industry standards, group standards, and international standardization trends. The magazine is a key reference for policymakers, standardization professionals, and enterprises.

**China Standardization (English Edition)** is an English-language journal published by China Standardization Press, targeting international readers. The magazine provides insights into China's latest standardization policies, regulatory developments, standard-setting activities, and international cooperation initiatives. It aims to promote information exchange and technical dialogue between China and the global standardization community, serving as an authoritative channel for foreign governments, international organizations, enterprises, and researchers to understand China's standardization efforts

## 2. Online Meeting Between CEN-CENELEC and China Battery Industry Association Regarding Battery Passport Standards

#Standardization-Cooperation

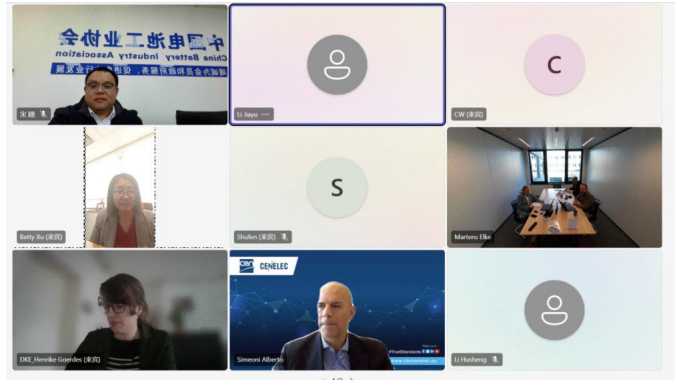
On April 1, 2025, the European Committee for Standardization and European Electrotechnical Committee for Standardization (**CEN-CENELEC**), the Seconded European Standardization Expert in China (**SESEC**), together with the German Commission for Electrical, Electronic and Information Technology (**DKE**) participated in an online meeting organized by China Battery Industry Association (**CBIA**).

Established in 1988 with the approval from the Ministry of Civil Affairs of People's Republic of China, CBIA is a national industrial social organization voluntarily formed by enterprises, institutions and individuals from the battery industry and related field.

During the meeting, CEN-CENELEC and CBIA exchanged updates on their respective standardization efforts regarding digital battery passports.

CEN-CENELEC's representatives, including Mr. Simeoni Alberto from European and International Policy shared that CEN-CENELEC aims to deliver 8 harmonized standards for DPP to Official Journal of the European Union (OJEU) by the end of 2025, in preparation for the implementation of the EU Battery Regulations in 2027. China has been closely monitoring the developments of the DPP in Europe, recognizing its importance in ensuring uninterrupted international trade in batteries. Integrating the DPP into China's standardization system has become one of CBIA's strategic priorities.

Mr. Song Yi, Director of CBIA's General Business department, along with his colleagues from the association's Digital Battery Passport Working Group, presented their standardization progress. They highlighted the Digital Battery Passport Pilot Program launched in 2024. The pilot program gathered 11 battery enterprises, aiming to explore the establishment of battery passport regulatory framework, formulate standards and assist enterprises designing battery passport



In January 2025, CBIA published **Data Security Technology-Guidelines for Data Classification and Grading of Power Batteries**, marking the country's first association standard aimed at regulating data classification, access rights, and system compliance within the power battery sector. In addition, CBIA also introduced 3 upcoming association standards for Power Battery Passports, which are currently open for public comments:

- Power Battery Digital Passport – Data Classification List
- Power Battery Digital Passport -Access Control Management
- Power Battery Digital Passport – System and Data Certification

CBIA anticipated submitting these association standards for approval in May 2025. The association also confirmed that China will incorporate **ISO PWI 25534-1 Digital Product Passport-Part 1: Overview and Fundamental Principles** in developing national standards in the future and will actively reference CEN-CENELEC's standardization work.

In addition, CEN-CENELEC posed questions regarding the organization of the DPP in China. CBIA explained that the country is exploring a technical solution that integrates industrial internet and trusted data space technologies. This approach emphasizes efficient data aggregation, unique identification, trusted storage, and secure supervision. CBIA believed that DPP systems and data can be standardized separately, as data models are often industry- or product-specific and can be developed independently.

The meeting also covered discussion on data security, international interoperability and other potential areas for future collaboration. Both sides agreed that enhanced communication is essential for promoting standard harmonization for battery passport. As China's battery passport is still in their early development, increased dialogue with European counterparts is expected to help the country establish a mature battery passport standard system more aligned with the European standards.



## Horizontal Actions

### 3. The 2025 Government Work Report: More Standardization Content Enters the Highest Decision-Making Agenda

#Standardization

On March 5, 2025, during the “Two Sessions,” Premier Li Qiang delivered the 2025 Government Work Report to the National People’s Congress, in which the term “standards” appeared eight times (directly related to standardization work), an increase of three mentions compared to the 2024 report. This reflects a rising emphasis on standardization in the top-level policy agenda.

Below is a comparison of standardization-related content in the two reports:

No.	2025 version	2024 version
1	– formulate and revise mandatory national standards for environmental protection, safety, etc.	
2	– adapt to people’s needs for high-quality housing by improving standards and norms to promote the construction of safe, comfortable, green, and smart “good houses.”	
3	– strengthen the standardized construction of compulsory education schools to promote high-quality, balanced development of compulsory education.	
4	– launch a standards upgrade initiative to guide the optimization and upgrading of traditional industries.	– implement a standards enhancement initiative, accelerate the establishment of a standard system that meets high-quality development requirements, and continuously improve the quality of goods and services to better meet people’s needs for an improved life.
5		– strengthen standardization leadership and quality support to create more internationally influential “made in China” brands.
6	– improve policies and standard systems that support green and low-carbon development, fostering a healthy development ecosystem for green and low-carbon industries.	
7	– improve the standard systems and fundamental frameworks for technology finance, green finance, inclusive finance, pension finance, and digital finance.	
8	– practically ensure equal treatment for foreign enterprises in areas such as factor acquisition, qualification licensing, standard setting, and government procurement.	– ensure equal participation in government procurement, bidding, and standard setting in accordance with the law and promote solutions for cross-border data flow issues.
9	– support the integration of domestic and foreign trade, accelerating the resolution of issues related to standards certification and	– actively align with high-standard international economic and trade rules, steadily expand institutional opening-up, enhance the synergy

	market channels.	between domestic and international markets and resources, consolidate the fundamentals of foreign trade and foreign investment, and cultivate new advantages in international economic cooperation and competition.
10		– formulate guidelines for the establishment of a unified national market.

### SESEC Observation:

- **Increased Focus on Standards for Livelihood Issues**

This year’s Government Work Report places greater emphasis on standardization efforts in areas directly related to people’s well-being, such as housing, education, and environmental protection. This suggests the government aims to expand the role of standards in improving public welfare.

- **Stronger Commitment to Foreign Enterprise Participation**

The phrasing regarding foreign enterprises’ equal participation in standardization, bidding, and procurement has shifted from “ensuring by law” to “ensuring in practice”. This change may indicate that more concrete measures will be introduced to facilitate foreign participation.

- **A Shift in China’s Trade Policy Approach**

Regarding international trade, the report moves from “actively aligning with international rules and cultivating new competitive advantages” to “resolving existing issues related to standard and certification barriers.” This may suggest that China’s stance on global trade has shifted from an aggressive push for integration to a more defensive posture, focusing on addressing current challenges.

### Background Information:

The “Two Sessions” refers to the National People’s Congress (NPC) Session and the Chinese People’s Political Consultative Conference (CPPCC) Session, which together constitute one of China’s most significant annual political events, held in early March each year.

The NPC session primarily focuses on reviewing and approving the Government Work Report. This report, delivered by the Premier of the State Council, summarizes the government’s progress over the past year and outlines development goals, directions, and key priorities for the coming year. During the session, the NPC also examines and approves national economic and social development plans, the state budget, and legislative amendments. Additionally, it deliberates and decides on major national matters, including the election of new state leadership.

The CPPCC session focuses on reviewing and approving the work report of its Standing Committee, evaluating the performance of the CPPCC over the past year, and setting tasks for the next phase. It also serves as a platform for submitting proposals and providing policy recommendations on key economic and social issues, as well as public concerns. The CPPCC session facilitates discussions on major national policies, contributing to informed decision-making by incorporating a broad range of public opinions and expert insights. Moreover, it plays a role in refining and advancing policy implementation through in-depth topic discussions.

## 4. China Establishes the National Standardization Research Institute Collaboration Mechanism

#Standardization-System

Hosted by China National Institute of Standardization (CNIS), the Inaugural Ceremony of the National Collaboration Mechanism for Standardization Research Institutes and the 4th Roundtable on Standardization Reform and Development were held in Beijing on November 29, 2024, to implement the National Standardization Development Outline and establish a standardization science and technology system with the comprehensive standardization research institute at the national level as the leader, and standardization research institutes at the industrial, regional and local levels as the mainstay.

The collaboration mechanism is of great significance for further giving play to the fundamental and leading role of standardization in promoting high-quality development. It is expected that the collaboration mechanism will facilitate in-depth cooperation among nationwide standardization research institutes, further improve the overall level of standardization in China, and boost scientific and technological self-reliance, said Liu Jun, Vice Administrator of SAMR.

He stressed that we should enhance the level of collaboration and serve the construction of a unified national market and the central tasks of local governments in the development of standards data resources, transformation of scientific and technological achievements, cultivation of professional talent, and other aspects. We should strive to achieve breakthroughs in standardization science and technology and lead the development of strategic emerging industries and future-oriented industries with innovation in technologies and standards, so as to promote new quality productive forces.

Xiao Han, Director General of Standards Innovative Management Department of SAMR announced the list

of the council members of the collaboration mechanism, and witnessed the signing of the statute by the council members and the official launch of the collaboration mechanism together with Wu Hequan, former Vice President, Academician of the Chinese Academy of Engineering (CAE), and Chair of China Standardization Expert Committee, Gong Ke, former President of Nankai University, Liu Hongsheng, Director General of Standards Technical Management Department of SAMR.

CNIS, assuming the chairmanship of the council, unveiled the Initiative of the National Collaboration Mechanism of Standardization Research institutes. Chongqing Institute of Quality & Standardization, Shenzhen Institute of Standards and Technology, and Shandong Institute of Standardization, made statements respectively as the vice-chair or member of the collaboration mechanism.

Luo Fangping, President of CNIS, addressed the event. Wu Hequan and Gong Ke gave speeches, elaborating on the development path of the digital and intelligent transformation of standards, and the opportunities and challenges that coordinated digital and green transformation has brought to the development of standardization.

After the inaugural ceremony, the Roundtable on the Reform and Development of Standardization was held, where experts from the industry, universities, and research institutes delivered speeches on the topic of frontier theory and practice of standardization development and had a roundtable discussion on the new measures for standardization reforms during the 15<sup>th</sup> Five-Year Plan period (2026-2030).

Source: China Standardization Magazine, Issue No. 2, 2025.

## 5. SAMR Released its Legislative Work Plans for 2025

#Legislative-Updates

On March 21, 2025, the State Administration for Market Regulation (SAMR) released its key legislative plan for 2025, aiming to promote high-quality social development. The work plan outlines 27 legislative items to be revised or formulated throughout the year, including 3 laws, 10 regulations, 11 administrative measures, and 2 provisions. These items can be categorized into five key areas, among which the quality development aspect is standards related.

The following lists the 27 legislative items by grouping them under the five key areas with a brief explanation of their legislative objectives.

- Quality Development:

To strengthen quality support and standards leadership and enhance quality development, efforts will be made to advance the formulation and revision of the following laws and administrative regulations:

- **Product Quality Law**
- **Regulations on Certification and Accreditation,**
- **Measures for the Quality Supervision and Administration of Fiber Products**
- **Regulations on the Management of Reference Materials**
- **Administrative Measures for Adopting International Standards**
- **Administrative Measures for the Licensing of Manufacturing and Repairing Measuring Instruments**

- Other Major Safety Risk Related:

To prevent and mitigate major safety risks related to food, drugs, industrial products, and special equipment, safeguarding safety bottom lines, laws, and regulations such as the **Medical Device Administration Law, Regulations on the Administration of Industrial**

**Product Production Licenses, and Regulations on Safety Supervision of Special Equipment** are proposed to be revised or formulated.

- Market Access and Business Entity:

To improve the quality and efficiency of market access and promote the healthy development of business entities, regulations such as **Administrative Measures for Business Entity Registration Archives** and other regulations are to be formulated.

- Fair Competition:

To enhance the effectiveness of fair competition policies and foster a fair and equitable market environment, regulations such as **Measures for the Implementation of the Regulations on Fair Competition Review, Regulations on the Protection of Trade Secrets,** and other regulations are to be revised or formulated.

- Platform Economy:

To improve the regularized regulatory framework for the platform economy and promote its standardized development, regulations such as **Measures for the Supervision and Administration of Rules of Online Trading Platforms** and other regulations are to be formulated.

The full list of the legislative items can be found here: [https://www.samr.gov.cn/xw/zj/art/2025/art\\_f4c6c21f93eb4e418bd5333ddd847a5b.html](https://www.samr.gov.cn/xw/zj/art/2025/art_f4c6c21f93eb4e418bd5333ddd847a5b.html)

SESEC will closely monitor the legislative progress of SAMR in 2025 and continuously provide in-time updates, especially with regard to the progress of the items under the quality development category.

# 6. China Seeks Public Opinions on the Second Amendment to Cybersecurity Law

#Legislative-Updates

On March 28, 2025, the Cyberspace Administration of China (CAC) released a draft amendment to the Cybersecurity Law (hereinafter referred to as the “amendment”) for public consultation. This is the second proposed revision since China’s the law’s initial enactment in 2017. The [first amendment](#) draft was released in 2022.

The amendment aims to coordinate with China’s evolving policy focus on enhancing its national security legal framework and strengthening the institutional capacity in the cybersecurity sector. Its objectives are to build a more unified and coordinated legal liability system, fill existing regulatory gaps, clarify implementation mechanisms, and define clear safety baselines and risk thresholds.

Changes occur in **Chapter Six** of the Cybersecurity Law which is about legal liability. The 2025 amendment follows 4 key lines of logic:

## I. Adjusting Legal Liability for Network Operation Security

### 1. Revision of Article 59:

Article 59 stipulated penalties for network and the nation’s critical information infrastructure operators with regards to non-compliance with **obligations** to ensure cyber security. The amendment increases penalties:

- The maximum fine for companies rises from 1 million to 10 million yuan
- The maximum fine for individuals increases from 500,000 to 1 million yuan.

In addition, a new penalty scenario is introduced for causing **large-scale data leaks** or **operational disruption in Critical Information Infrastructure (CII)**, such as failures in telecommunications network or satellite systems.

Critical Information Infrastructure refers to important network infrastructure and information systems in public telecommunications, information services, energy sources, transportation and other critical industries and domains. The inclusion of CII aims to

address new risks and challenges found within China’s cybersecurity system throughout the technological development in the past few years and reflects China’s intention to adopt a more stringent national security approach to ensure its public interests.

### 2. Addition of Article 61:

New Article 61 makes **safety certification** and **safety testing** compulsory. Failure to comply will cause severe penalties. The content of the new provision is provided below:

*Article 61 in the Revised Draft of Cybersecurity Law (2025)*

*“Where any person violates the provisions of Article 23 of this Law by **selling or providing** network critical equipment or specialized products for network security that **have not been subject to safety certification or safety testing**, or **that have failed safety certification or do not meet the requirements of safety testing**, the relevant competent department shall order such person to make corrections or stop the illegal act, give a warning, and confiscate the illegal products and illegal gains; **if the illegal gains exceed 100,000 yuan**, a fine of one to three times the amount of the illegal gains may also be imposed; if there are **no illegal gains or the illegal gains are less than 100,000 yuan**, a fine of not less than 30,000 yuan but not more than 100,000 yuan may also be imposed.”*

The new Article 61 also cited Article 23 of the Cybersecurity law which described that network critical equipment and dedicated products for network security must receive certification from a qualified institution in accordance with the **mandatory requirements of relevant national standards** or **pass security testing** before they can be sold or provided.

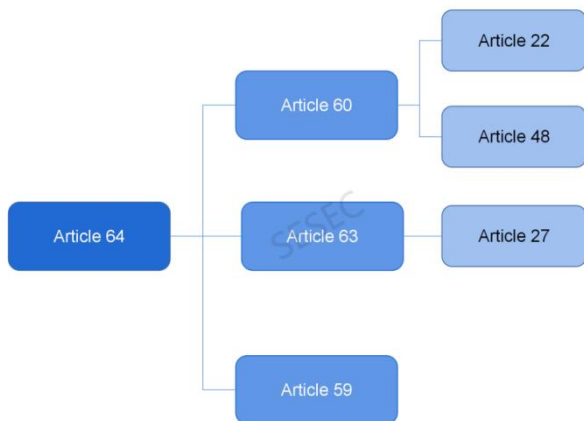
The list of network critical equipment and dedicated products for network security is **determined by CAC**, in conjunction with relevant departments of the State Council. (View the product catalogue developed by CAC in Chinese language from [here](#)). Stakeholders whose products and services are included in this catalogue or are affected by its usage need to familiarize themselves with this Article 61 to avoid significant compliance risks.

### 3. Addition of Article 64:

The new Article 64 in the amendment draft stipulates that:

“Where the acts as prescribed in Paragraph 1 and Paragraph 2 of **Article 60** and **Article 63** of this Law cause the consequences as prescribed in Paragraph 3 of **Article 59** of this Law, the punishment shall be imposed in accordance with the provisions of that paragraph.”

Below is a flowchart that visualizes the mechanism of this clause:



Article 60 addresses the penalties for violation of **illegal acts** included in Article 22 & 48, while Article 63 addresses the penalties for violation of **illegal acts** included in Article 27. Paragraph 3 of Article 59 refers to the newly added legal liabilities concerning cases such as those cause massive data leaks and discontinuity of critical information infrastructure’s operation.

Key related violations under Article 64 include:

- Article 22 – Malicious programs and security flaws found in network products and services of the operators.
- Article 48 – Malicious programs and security flaws found in electronic information sent and application software operated by the relevant service providers.
- Article 27 – Illegal intrusion and stealing of network data of any individual or organization.

However, the difference between existing version and the amendment draft is that the amendment streamlines the penalty mechanism for violations of specific provisions, whereas the existing version establishes penalties separately for each violation.

## II. Clarifying Legal Responsibility Regarding Network Information Security

### 1. Merging the original Article 68 & 69 and Increasing Penalties:

The amendment merges the original Article 68 & 69 into a new Article 69 to also streamline the penalty framework but **heavier penalties**.

Maximum penalties increase from 500,000 to 2 million yuan, with potential escalation to 10 million yuan for severe cases.

Network operators, electronic information transmission service providers, and application software download service providers are identified as parties subject to these penalties.

The focus here is on significantly heightening the cost of non-compliance and misconduct.

### III. Specifying Legal Responsibility Regarding the Security of Personal Information and Important Data

The amendment consolidates the first paragraph in the original Article 64, the original Article 66 and Article 71 into a new Article 71 in the amendment. This new provision targets cases related to violating laws and regulations of Personal Information.

The new Article also emphasizes CII operators, further reflecting China’s strategic shift towards a more robust CII operator management framework for national security purposes.

### IV. Specifying Circumstances Where Administrative Penalties May Be Mitigated, Reduced or Waived.

Lastly, the amendment has added a new Article 72, under which administrative penalties may be reduced, mitigated, or waived.

New Article 72 in the Revised Draft of Cybersecurity Law (2025)

“Where a network operator **takes the initiative** to eliminate or mitigate the harmful consequences of its illegal acts, or where the **illegal act is minor** and is promptly corrected without causing any harmful consequences, or where it is a **first-time violation** and the **harmful consequences are minor** and are promptly corrected, the administrative penalty shall be mitigated, reduced or not imposed in accordance with the provisions of the Administrative Penalty Law of the People’s Republic of China.

The relevant competent authorities shall, in accordance with their duties, **formulate corresponding benchmarks** for administrative penalty discretion and **standardize the exercise** of administrative penalty discretion.”

However, this new provision leaves several key points unclear:

- What qualifies as a “minor illegal act”?
- What constitutes “minor harmful consequences”?
- How is the severity assessed, and how are penalty reductions determined?
- What authorities are involved in the evaluations and final decisions?

These ambiguities could create challenges during enforcement. We may expect more details after public consultation in the final draft for official release. Moreover, additional clarifications may emerge through practical application once the amendment is formally adopted, and real-world cases arise.

To sum up, what European stakeholders need to take note of in this amendment draft are the potentially hefty compliance cost and the ambiguities surrounding the determination of violation severity and the involvement of CII operators in your business and trade activities. Although foreign stakeholders are unlikely to be designated as CII operators by the Chinese government, the provisions related to CII operators still hold relevance if your products and services are involved. SESEC will continue to monitor developments related to China’s Cybersecurity Law and provide timely updates. We recommend European stakeholders closely follow these changes closely, seeking professional advice and familiarizing themselves with the evolving legal framework.

## 7. China Reconfirmed International Standards as ISO/IEC/ITU Standards

### #Standardization

On March 25, 2025, the State Administration for Market Regulation (SAMR) revised and issued the **Administrative Measures for Adopting International Standards** (hereinafter referred to as “the Measures”). In the Measures, it has reconfirmed that international standards are those published by the three major international standardization organizations: **ISO, IEC, and ITU**.

In SAMR website, it is reported as below.

To further standardize the work of adopting international standards, steadily expand the institutional openness of China’s standardization system, and accelerate the integration of domestic and international trade, the State Administration for Market Regulation (SAMR) has revised and issued the **Administrative Measures for Adopting International Standards** (hereinafter referred to as “the Measures”) since May 2024. The official version was released on March 25, 2025, and will take effect on **June 1, 2025**.

The revision focuses on five key areas:

#### 1. Clarifying the scope of international standards and adopting entities

The Measures specify that the applicable international standards are those published by the three major international standardization organizations: **ISO, IEC, and ITU**. **Adoption of international standards” refers to the identical**

**or modified transformation of international standards into Chinese national standards.**

#### 2. Establishing a full-process international standard tracking mechanism

The Measures require that domestic organizations undertaking mirror work for international standardization technical bodies must monitor the latest progress and trends of relevant international standards. They must inform national technical standardization committees and other relevant stakeholders **within 30 days** of the completion of each development stage of an international standard.

#### 3. Setting timelines for adopting international standards as national standards

The Measures stipulate that projects to adopt international standards should be given priority during project approval. The time frame from project approval to submission of the approval draft should generally not exceed 12 months. For ongoing international standards under development, the Measures encourage simultaneous development and implementation of corresponding national standards in China.

#### 4. Strengthening copyright policy requirements

The Measures emphasize copyright protection across multiple stages, including project evaluation, approval review, and public release

of adopted standards. It is explicitly required that the publication of adopted national standards must comply with Chinese laws and regulations as well as the copyright policies of international standardization organizations.

#### 5. Improving oversight and correction mechanisms

The Measures provide that the national administrative department for standardization under the State Council shall organize evaluations of the implementation of adopted national standards in key sectors. Relevant departments under the State Council are also to organize evaluations within their respective fields. If problems are identified in the adopted international standards, issues and revision suggestions should be promptly submitted to the relevant international standardization bodies.

SAMR intends to use the release of the Measures as an opportunity to further advance the alignment of Chinese national standards with international standards. The International Standards Tracking and Transformation Platform will be updated in a timely manner to reflect the latest international standards, providing strong support for building a high-level open economic system based on standards.

- SESEC previously translated the draft for public consultation of this regulation under the title: [SAMR Seeks Public Feedback on the Revision of the Administrative Measures for Adopting International Standards – sesec.eu](#)
- The English version of the newly issued *Administrative Measures for Adopting International Standards* is attached to the Annex of the March&April 2025 Newsletter.

## SAMR Press Conference

On April 21, 2025, China’s State Administration for Market Regulation (SAMR) held a press conference for the revised *Administrative Measures for the Adoption of International Standards*.



Below is the full English translation of the press conference’s transcript

### Transcript of SAMR Press Conference on the Interpretation of the *Administrative Measures for the Adoption of International Standards* April 21, 2025 – Afternoon Session



#### Wang Qiuping, Director-General of the Publicity Department, SAMR:

Ladies and gentlemen, fellow journalists, good afternoon! Welcome to today’s special press conference held by the State Administration for Market Regulation (SAMR).

To implement the directives of the CPC Central Committee and the State Council regarding the adoption of international standards, and in reference to relevant rules from the World Trade Organization (WTO) and international standardization organizations, while considering China’s national circumstances, SAMR has recently revised and issued the *Administrative Measures for the Adoption of International Standards*

(hereinafter referred to as the “Measures”). The aim is to further regulate the adoption of international standards, promote institutional opening-up through standardization, and accelerate the integration of domestic and international markets. The new Measures will come into effect on June 1, 2025.

To help you better understand the contents of these Measures, we have invited **Mr. Xiao Han**, Director-General of the Department of Standards Innovation of SAMR; **Mr. Wang Huowang**, Deputy Director-General of the Department of Policies and Regulations; **Mr. Wang Yuhuan**, Deputy Director-General of the Department of Technical Standards; and **Mr. Li Zhiping**, Deputy Director of the China National Institute of Standardization (CNIS). They will introduce the overall situation and answer your questions.

First, let’s invite Director Xiao Han to give an overview of the Measures.



**Xiao Han, Director-General of the Department of Standards Innovation, SAMR:**

Good afternoon! Thank you for your continued attention to the work of SAMR and your support for international standardization efforts.

To implement the directives of the CPC Central Committee and the State Council, and with reference to relevant WTO and international standardization rules, SAMR has organized the revision of the *Administrative Measures for the Adoption of International Standards*. This revision focuses on three key areas:

1. Clarifying the scope of international standards that may be adopted and the responsible adopting entities.
2. Defining a full-process management system for the adoption of international standards.
3. Strengthening compliance with copyright policies.

The new Measures will come into force on June 1, 2025.

Next, SAMR will work with relevant departments to implement the Measures from three aspects:

1. Strengthen oversight of technical standardization committees and counterpart units regarding standard adoption work.
2. Promote greater policy, funding, and talent support for standard adoption activities.
3. Conduct extensive promotion and training, summarize and share best practices, and foster a positive environment for adopting international standards into national standards.

Let me also briefly introduce the concept of “National Standard Adopting International Standards” (采标国家标准). This refers to standards that adopt international standards and transform their contents into national standards of China. In fact, many national standards are independently developed based on China’s own needs and not derived from international standards. Thank you!

**Reporter from China Quality News:**

– Could you briefly explain the background and main contents of the revised Measures?



**Wang Huowang, Deputy Director-General, Department of Policies and Regulations, SAMR:**

The 20th National Congress of the CPC called for steadily expanding institutional opening-up in areas such as rules, regulations, management, and standards. The *National Standardization Development Outline* set a quantitative goal of achieving over 85% international standard conversion rate by 2025. Meanwhile, international standards organizations like ISO and IEC have tightened copyright compliance requirements for member countries.

The previous version of the Measures was no longer aligned with current needs. Hence, the new revision includes four main aspects:

**1. Scope and Entities:**

The Measures confirm that only standards issued by ISO, IEC, and ITU are recognized as international standards for adoption. It also states that in cases where no applicable standards exist from these organizations, or their standards are unsuitable for China, other international or foreign standards may be adopted. Adoption means equivalent or modified transformation of these international standards into *national* standards, per ISO and IEC copyright rules.

**2. Responsibilities:**

The State Council’s standardization authority is responsible for centralized management. Sectoral authorities oversee adoption in their respective fields. Industry associations may assist under national regulations.

**3. Principles and Requirements:**

Adoption should consider national conditions and aim for alignment with the international standards system. Foundational standards should be prioritized, and discrepancies with international standards should be

**4. Full-Process Management:**

Adoption must comply with national standard-setting procedures and include additional steps such as dynamic tracking, applicability analysis, and validation of international standards. The Measures also call for shorter development cycles, outcome evaluation, and updates of adopted standards.

Thank you!

**Reporter from CCTV News Center:**

– **How does adopting international standards reflect China’s commitment to high-level opening-up and alignment with international trade and technical rules?**

**Xiao Han, Director-General of the Department of Standards Innovation, SAMR:**

The *WTO/TBT Agreement* requires members to base technical regulations and standards on international standards where possible. This serves as a legal basis for adopting international standards in China.

Given increasing global scrutiny of China’s standardization efforts, heightened IP protection pressures, and stricter adoption policies from international standards bodies like ISO and IEC, China—as a member of the WTO, ISO, IEC, and ITU—must enhance alignment with global trade rules and fulfill international obligations.

The revised Measures specify in Articles 11, 16, and 18 that all national standards adopting international standards must comply with copyright policies in the processes of evaluation, approval, and publication. For standards from other international or foreign organizations, adoption must also comply with their IP policies and Chinese laws which is stipulated in the Article 23 of the revised Measures.

Thank you!

**Reporter from Bauhinia Magazine (Hong Kong):**

– **How is the positioning of the *Administrative Measures for the Adoption of International Standards* different from the *Administrative Measures for National Standards* and the *Administrative Measures for Compulsory National Standards*? How should they be applied in practice?**



**Wang Yuhuan, Deputy Director-General, Department of Technical Standards, SAMR:**

The *Administrative Measures for National Standards* is the general law governing national standards. The *Administrative Measures for Compulsory National Standards* is a special law specific to mandatory standards.

The *Administrative Measures for the Adoption of International Standards* is a specialized law focused on integrating international standards into national ones. It aligns with the *Standardization Law*, the *National*

**Standardization Development Outline**, and the goal of institutional opening-up.

In practice, standards adopting international content must follow both the general standard-setting procedures and specific additional steps, including:

**1. Preliminary Research:**

Tracking international standards, analyzing applicability, and verifying technical content are now required. The Measures specify responsible parties and deadlines for these tasks.

**2. Stricter Evaluation:**

Evaluation must consider compliance with IP rules and suitability for national adoption. Drafting must follow relevant editorial guidelines (e.g., GB/T 1.2).

**3. Faster Timelines:**

If based on existing international standards, the process from project planning to submission must not exceed 12 months. Simultaneous development is encouraged by ongoing international standards.

**4. Implementation Evaluation:**

Key sectors must assess the effectiveness of adopted national standards. Problems must be reported to international bodies with improvement suggestions.

Thank you!

**Reporter from China News Service:**

– **What are the updated definitions of international standards and adopted standards under the new Measures? How do they differ from the 2001 version?**



**Li Zhiping, Deputy Director, China National Institute of Standardization (CNIS):**

The new Measures clearly define international standards as those issued by ISO, IEC, or ITU. Adoption refers to transforming their contents, either identically or with modifications, into national standards.

In the 2001 version, adoption included national, sectoral, local, and enterprise standards, and recognized other international standards validated by ISO. However, ISO no longer confirms other international organizations' standards, and both ISO and IEC now require that their standards only be adopted as national standards.

Thus, the scope has been tightened:

- Only ISO, IEC, and ITU standards may be adopted.
- Only *national* standards, not sectoral, local, or enterprise ones, can result from this adoption.
- Standards from other foreign/international sources may still be adopted, but with strict compliance with IP policies and legal requirements.

Thank you!

**Reporter from Workers' Daily:**

– The Measures mention encouraging various stakeholders to participate in the development and implementation of adopted national standards. Will this burden enterprises? What is the practical significance for business development?

**Xiao Han, Director-General, Department of Standards Innovation, SAMR:**

The Measures encourage voluntary participation from producers, operators, users, consumer groups, and public interest stakeholders. Government authorities at all levels will support this through policies, funding, and training.

There are two key benefits for enterprises:

**1. Facilitates International Trade:**

Adopted national standards serve as a “passport” for overseas business. International contracts often specify quality standards based on international norms. Applying adopted standards in design, production, and testing ensures compliance.

**2. Promotes Technological Advancement:**

For many SMEs in China, adopting international standards is more cost-effective than independently developing new ones. It enables rapid technological progress and helps reach international levels efficiently.

Thus, rather than adding burdens, adoption supports business growth and global integration.

Thank you!

**Wang Qiuping, Director-General, Publicity Department, SAMR:**

Thank you to all journalists and speakers. That concludes with the Q&A session. If you have further questions, please feel free to contact us after the event.

**Access to the original Chinese article on the press conference from SAMR website:**

[https://www.samr.gov.cn/xw/xwfbt/art/2025/art\\_6d884626cffe4d5580d8ce4a18b8e3b5.html](https://www.samr.gov.cn/xw/xwfbt/art/2025/art_6d884626cffe4d5580d8ce4a18b8e3b5.html)

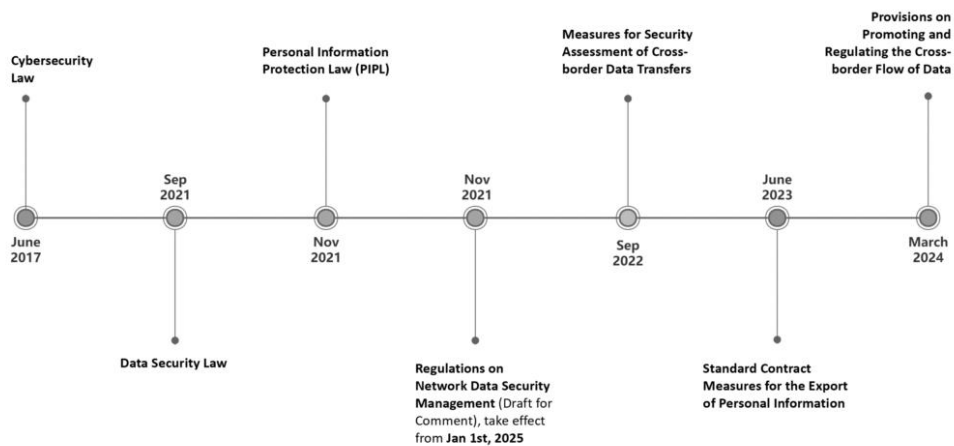
## 8.

## Q&amp;A on China's Data Export Security Management Policies

#Cross-Border-Dataflow

On April 9, 2025, The Cyberspace Administration of China (CAC) released a Question & Answer to address common questions regarding data export security management policies. This Q&A aims to help the data processors strengthen their understanding of the best compliance practices in cross-border data activities.

Before starting to read the Q&A, a list of China's current laws and regulations regarding data security is provided below to help reader gain a structured overview of China's current legal framework:



### Questions 1: How should we understand the design of China's data export security management system?

**Answer:** As cross-border data flows become more frequent, many countries and regions have explored regulatory frameworks based on their specific circumstances, enacting laws and standards to manage cross-border data flows.

China's data export security management system is established by law. The **Cybersecurity Law**, the **Data Security Law**, and the **Personal Information Protection Law (PIPL)** provide clear legal provisions for cross-border data activities.

These rules apply only to important data and personal information. For **important data** that must be transferred abroad, legal provisions allow it to be exported if a security assessment confirms it poses no threat to national security or public interests. For **personal information** export, multiple pathways are available, including security assessments, protection certifications, and standard contracts.

Overall, China's legal framework aims to ensure the secure and free cross-border flow of data for businesses while imposing necessary oversight on data involving national security and public policy objectives. **General data** not involving personal information or important data can flow freely across borders, while important data and personal information meeting specified thresholds can be legally transferred after passing a security assessment.

### Question 2: How can consistency in the standards for negative lists of cross-border data flow across free trade zones be ensured?

**Answer:** The **Provisions on Promoting and Regulating Cross-Border Data Flows** allow free trade zones to develop their own negative lists under the national data classification and grading protection framework.

These lists, approved by provincial cybersecurity and informatization committees, filed with the CAC and the National Data Administration, exempt data outside the lists from security assessments, standard contract, or certification. This is an innovative measure to facilitate cross-border data flows in free trade zones.

During development, relevant authorities' opinions are sought, and the CAC and National Data Administration review the lists during filing. If a list already exists for a specific sector, other free trade zones can adopt it without duplication. This ensures alignment with national data protection requirements and consistency across zones.

### Question 3: How can the scope of negative lists for cross-border data flow in free trade zones be expanded to cover more sectors?

**Answer:** In line with the *Provisions on Promoting and Regulating Cross-Border Data Flows*, the CAC and the National Data Administration have completed filings for negative lists in free trade zones (ports) in Tianjin, Beijing, Hainan, Shanghai, and Zhejiang, promoting cross-border data flows in 17 sectors such as automotive, pharmaceuticals, retail, civil aviation, reinsurance, deep sea and seed industry. The figure below shows 17 affected sectors.

Tianjin	Beijing	Zhejiang	Shanghai	Hainan
Not Sorted Out by Industry	Automotive Pharmaceuticals Civil Aviation Retail and Modern Service Industry Artificial Intelligence Training	E-commerce (B2B) Clearing and Settlement Industry	Reinsurance Industry International Shipping Business The Catering Industry The Accommodation Industry	Deep Sea Aviation Seed Industry Tourism Duty-free Retail Business

The CAC is guiding free-trade zones to develop lists based on their industrial characteristics, with coverage expected to broaden as more lists are implemented. Updates can be monitored on the CAC website ([www.cac.gov.cn](http://www.cac.gov.cn)) and relevant local free trade zone websites.

### Question 4: How should the necessity of personal information export be understood and assessed?

**Answer:** Article 6 of the *Personal Information Protection Law (PIPL)* stipulates that “the processing of personal information should have a clear and reasonable purpose, be directly related to the purpose of processing, and adopt methods that have the minimal impact on individual rights. The collection of personal information should be limited to the minimum scope necessary to achieve the purpose of processing, and excessive collection of personal information is prohibited.”

**Article 19** stipulates that “unless otherwise provided by laws or administrative regulations, the retention period of personal information should be the shortest time necessary to achieve the purpose of processing.”

Based on the above legal provisions, the factors for determining “necessity” include being directly related to the purpose of processing, minimizing the impact on individual rights, limiting to the minimum scope necessary to achieve the purpose of processing, and retaining personal information for the shortest time necessary to achieve the purpose of processing. To implement the legal requirements, the CAC will fully consider the business scenarios and actual needs declared by data processors during its data export security assessment process. It will evaluate the

necessity of personal information transfers abroad, with key assessments including the necessity of the outbound activity itself, the necessity of the scale of individuals involved, and the necessity of the scope of personal information data items transferred abroad.

Numerous industries and fields involve cross-border data transfer. The CAC, in collaboration with relevant industry regulators, will gradually refine and clarify specific business scenarios for data export and the necessary scope of personal information transfers in various industries, providing more detailed policy guidance for enterprises and institutions conducting data outbound transfer.

#### **Question 5: How can important data be identified?**

**Answer:** According to **Article 62** of the *Regulations on Network Data Security Management*, important data refers to data in specific domains, groups, or regions, or data of certain precision and scale, whose compromise could directly threaten national security, economic operations, social stability, or public health and safety. **GB/T 43697-2024 The Data Security Technology – Data Classification and Grading Rules** provides guidelines for identifying important data, enabling data processors to classify and report such data in compliance with laws and standards.

#### **Question 6: Does important data mean it cannot be transferred abroad?**

**Answer:** For important data that indeed needs to be transferred abroad, the law provides a regulatory framework. If the data export security assessment determines that the transfer will not harm national security or public interest, the data can be transferred abroad.

As of March 2025, the CAC has completed 298 data export security assessment projects. Among these, 44 applications involved important data, with seven failing the assessment, resulting in a failure rate of 15.9%.

These 44 applications covered 509 important data items, of which 325 were approved for export after assessment, accounting for 63.9% of the total number of declared data items.

#### **Question 7: How do foreign-invested enterprises play a role in the process of formulating industry technical standards?**

**Answer:** Guiding relevant professional institutions in the process of formulating sectoral technical standards, the CAC also highly values and actively encourages the participation of both Chinese and foreign enterprises, as well as other stakeholders. This ensures that the standard-setting process fully considers the needs of relevant domestic and international parties.

First, the participation mechanism is open and transparent. The CAC directs the National Cybersecurity Standardization Technical Committee to adhere to the principles of openness, cooperation, and broad participation. It publicly solicits members for working groups on an ongoing basis. Members of the committee and its sub-working groups include a number of representative foreign-invested enterprises. These enterprises enjoy equal rights and obligations as domestic companies and institutions in terms of participating in discussions and contributing to standard development. As members of the working group, foreign-invested enterprises can participate throughout the entire process and provide opinions and suggestions at all stages of standard development.

Second, the procedures for standard-setting are open and transparent. By publicly soliciting standard requirements and co-authoring organizations from society, and by seeking public comments on draft standards, fairness and impartiality are ensured for all relevant parties involved in the standard-setting process.

#### **Question 8: Are there more convenient channels for cross-border personal information transfers within corporate groups?**

**Answer:** On the one hand, if multiple domestic subsidiaries belong to the same corporate group and their cross-border data transfer scenarios are similar, the parent company can act as the filing entity to consolidate and submit applications for data export security assessments or file standard contracts for personal information transfers abroad. This approach improves the efficiency of cross-border data workflows.

On the other hand, the CAC is promoting the introduction of relevant management measures for certification of personal information protection in cross-border transfers. These measures will guide third-party professional certification bodies to certify cross-border personal information transfer activities.

Once either the domestic enterprise or the overseas recipient passes the certification, the enterprise can conduct personal information transfers abroad within the scope of the certification. For multinational groups that have passed the certification, personal information transfers can be conducted within the group without the need to separately sign standard contracts for personal information transfers with subsidiaries in different countries.

**Question 9: Is there a specific process for extending the validity period of data export security assessment results?**

**Answer:** The *Regulation on Promoting and Regulating Cross-Border Data Flows* extends the validity period of data export security assessment results from the original 2 years to 3 years. It also clarifies that if the validity period expires, and the data processor needs to continue conducting cross-border data activities without any circumstances requiring a re-application for a data export security assessment, the data processor may apply to extend the validity period of the assessment results within 60 working days before the expiration. The application is submitted through the provincial cyberspace administration department to the national cyberspace administration department.

Upon approval by the national cyberspace administration, the validity period of the assessment results can be extended for another 3 years. Currently, the CAC is actively soliciting opinions from all parties and expediting research on the process for extending the validity period of assessment results. It plans to clarify this process by revising and issuing relevant policy documents, thereby creating more favorable conditions for enterprises and institutions engaging in data export activities.

Source: [https://www.cac.gov.cn/2025-04/09/c\\_1745906286623776.htm](https://www.cac.gov.cn/2025-04/09/c_1745906286623776.htm)

# 9. Revision ‘Administrative Provisions on National Standardization Guiding Technical Document’ Published

#Standardization

On April 7, 2025, the Standardization Administration of China (SAC) officially issued the revised **Administrative Provisions on National Standardization Guiding Technical Documents** (“Provisions”), which came into effect immediately. These Provisions introduce significant updates to China’s standardization framework, particularly designed to support the rapid development of innovative technologies that are not yet mature enough to be formalized into national standards. This new regulatory approach aims to broaden the transformation channels for technological achievements, diversify the types of standardized deliverables, and accelerate the deployment of innovative standards to promote high-quality industrial development.

The guiding technical documents are positioned as a critical supplement to the national standards system, bridging the gap between early-stage technological innovation and the formal standardization process.

## Key Innovations Introduced in the Revised Provisions

### 1. Diversification of Document Types

One of the most notable changes in the new Provisions is the **classification of guiding technical documents into two distinct types**:

- **Normative Guiding Technical Documents:** These documents provide rules, guidelines, or specifications for standardization subjects that are still in technological development. They offer structured technical references and have the potential to be upgraded to full national standards in the future.
- **Report-Type Guiding Technical Documents:** These documents compile data, technical experiences, case studies, developmental trends, and testing reports. They are intended to provide informative and reference-oriented content without prescribing mandatory rules.

This categorization closely follows international practices in standardization. For example, ISO and IEC classify their publications into types such as Technical Specifications (TS), Publicly Available Specifications (PAS), Technical Reports (TR), Guides, and International Workshop Agreements (IWA). By aligning with global practices, China seeks to enrich its portfolio of standardization deliverables and enhance its international standardization presence.

### 2. Adoption of a Project Registration System

The new Provisions simplify and accelerate the launch of guiding technical document projects by implementing a **registration-based system**. Under this system:

- Once a project proposal is evaluated and approved by the relevant technical committee, it can be **immediately registered** and **move directly into the drafting phase** without the need for a formal project approval process.

This change is intended to **significantly reduce the time required to initiate projects** and support the agile development of standards in fast-evolving technological fields.

### 3. Relaxation of Voting Requirements

The Provisions also **lower the threshold for project and document approval**, compared to the stricter requirements for national standards:

**During project initiation:**

- At least 75% of the committee members must participate in the vote.
- Approval requires only a **simple majority (more than 50%)** of participating votes.

#### During technical review:

- Online meetings are permitted.
- Approval similarly requires a simple majority among participating members.

In contrast, for **national standards**, approval requires:

- 75% minimum voting participation.
- Two-thirds affirmative votes.
- No more than one-fourth of participants voted against it.

By relaxing the voting requirements, the SAC aims to **increase the volume of guiding technical documents** available and provide more technical support for emerging industries.

#### 4. Shortened Development Timelines

In a move to accelerate the deployment of innovative technical documents, the Provisions introduce **more compressed timelines** compared to national standards:

Phase	Recommended National Standard	Mandatory National Standard	Guiding Technical Document
Public Consultation on Proposal	≥30 days	≥30 days	Immediate after registration
Public Consultation on Draft	≥60 days	≥60 days	≥30 days
Approval Period	No strict requirement	≤2 months	≤30 days
Total Development Timeline	≤18 months	≤24 months	≤12 months
Maximum Extension	≤6 months	≤12 months	≤3 months

*Note: In special cases, timelines may be shortened or extended under specified rules.*

Thus, the overall project cycle for guiding technical documents is **shorter and more flexible** than that of traditional national standards. The maximum project period is set at **12 months**, with extensions capped at 3 months if needed.

#### Strategic Significance

- **Accelerating Innovation and Technology Transfer**

- The revised Provisions are strategically positioned to facilitate **the rapid transformation of scientific and technological innovations into industrial applications**. By offering a quicker and more flexible alternative to national standards, guiding technical documents enables emerging technologies to be standardized and adopted at an early stage, thus accelerating their commercialization and diffusion across industries.
- **Enhancing International Alignment**
  - By mirroring international practices in document categorization and management, China is demonstrating a commitment to **align its standardization system more closely with global systems**, promoting the international recognition of its domestic technical achievements and supporting Chinese enterprises' global competitiveness.
- **Stimulating Industrial Innovation**
  - The Provisions encourage greater participation by industry associations and technical committees in the standardization process. They also foster an environment where companies, particularly **small and medium-sized enterprises (SMEs)**, can actively contribute to and benefit from the standardization of cutting-edge technologies, thereby **narrowing the technological gap between SMEs and large enterprises**.

## Some Specific Supporting Measures and potential Impacts for China Standardization System

### 1. Encouragement of Association Standards

The Provisions explicitly encourage the **conversion of advanced and applicable association standards into guiding technical documents**. This is an important step forward from the 2023 SAC rules, which allowed association standards to be adopted into recommended national standards.

By institutionalizing this conversion pathway, China promotes:

- **Faster diffusion of advanced technologies.**
- **Stronger technical support for SMEs.**
- **Stimulated innovation vitality across industries.**

Some analysts point out that association standards that are transformed into guiding technical documents can later be further upgraded to national standards if appropriate. Whether SAC will allow or promote such activity will be under observation, simply because there are too many association standards at this moment.

### 2. Document Numbering and Formatting

To clearly distinguish guiding technical documents from national standards, the following formatting rules are applied:

- **Numbering:** Prefixed with **"GB/Z"**, followed by a sequential number starting from 1, and the year of issue.
- **Cover Page:** Only the **publication date** is indicated. **No implementation date** is provided, reflecting the documents' reference-only nature without any mandatory enforcement.

This distinction ensures clarity for users and maintains the formal separation between different types of standardization deliverables.

## Conclusion

The **Administrative Provisions on National Standardization Guiding Technical Documents** represent a major innovation in China's standardization system, aligning with both domestic needs and international practices. By offering a faster, more flexible pathway to standardize emerging technologies, the Provisions are expected to:

- Enhance the supply of standards in fast-developing sectors.
- Support the integration of technology and industry.
- Promote the rapid transformation of scientific achievements into marketable industrial capabilities.
- Strengthen China's voice in global standardization governance.

In the future, the guiding technical documents are likely to play a more important role.

Source: [https://www.sac.gov.cn/xw/bzhdt/art/2025/art\\_debaf053239b46059c4f2c9a116a1180.html](https://www.sac.gov.cn/xw/bzhdt/art/2025/art_debaf053239b46059c4f2c9a116a1180.html)

## 10. China Releases the BRICS Action Plan on Trade Development and Standard Cooperation Initiative (2025 - 2026)

#Belt-and-Road Initiative

On April 18, 2025, the BRICS Forum on Economic and Trade Activities was held in Beijing under the theme "Standardization Cooperation for Trade Development, BRICS Partnership Empowering the Global South." During the forum, the **BRICS Action Plan on Trade Development and Standardization Cooperation (2025–2026)** (hereinafter referred to as the "Action Plan") was officially released.

With the vision of "Better Standards for Better Trade, Better Trade for a Better World," the Action Plan aims to deepen standardization cooperation among BRICS countries. It seeks to promote trade facilitation, sustainable development, and industrial innovation, contributing to the creation of a more sustainable, inclusive, and resilient "Big BRICS Cooperation."

In response to the complex and evolving global economic landscape, the Action Plan focuses on key areas and outlines five core objectives. It emphasizes:

- **Promoting information sharing and mutual recognition of standards** to reduce technical barriers in goods, services, cultural, and digital trade, thereby enhancing trade facilitation in BRICS countries.
- **Leveraging international standards, technical regulations, and voluntary sustainability standards** as technical foundations to accelerate the implementation of the Sustainable Development Agenda and promote coordinated economic, social, and environmental development.
- **Promoting the "Codes of Good Practice for Sustainability Systems" of ISEAL Alliance** to encourage the adoption of credible and effective sustainability standards.

- *Note: ISEAL stands for International Social and Environmental Accreditation and Labelling.*

- **Advocating for the establishment of a "Global Sustainable Standards Day"** to raise awareness and visibility of sustainability in standardization.
- **Enhancing standardization capacities** through training and project cooperation, while encouraging BRICS countries to take a leading role in developing and revising standards in international standardization organizations such as ISO, IEC, and ITU, as well as de-facto standardization Developing bodies like the Organization for the Development of Cooperation in Trade and Standards (ODCCN).

These initiatives aim to strengthen BRICS' influence in global rulemaking and inject new momentum—"BRICS energy"—into global economic governance.

To realize its cooperative vision, the Action Plan outlines a series of implementation pathways. BRICS countries will establish a multi-dimensional collaborative mechanism, centering around the Organization for the Development of Cooperation in Trade and Standards (ODCCN). This includes:

- **Establishing the "ODCCN BRICS Cooperation Committee (ODCCN/BCC)"** to coordinate BRICS efforts in trade and standardization.
- **Building a shared information platform or dedicated section** for BRICS trade and standardization, leveraging existing resources such as the Global Trade Helpdesk (established by the

UN International Trade Centre) and org (developed by the WTO Informal Working Group on MSMEs);

- **Coordinating standard development, technical exchanges, and talent cultivation**, accelerating alignment in key technical areas.
- **Deepening standard alignment in priority sectors** by institutionalizing annual standardization conferences and industry-specific working group meetings.
- **Jointly initiating proposals in emerging areas** such as the digital economy and sustainable trade.
- **Gradually eliminating trade barriers** through mutual recognition of cross-border technical regulations.
- **Strengthening standardization capacity-building** by holding regular BRICS seminars and training programs on trade and standardization cooperation, aimed at enhancing the overall

standardization level across BRICS countries and supporting deeper economic and trade collaboration.

Standards are the cornerstone of trade and a technical tool for global economic governance. The release of this Action Plan marks the wish of China on a new phase in which BRICS countries will leverage standardization cooperation as a key driver to jointly improve multilateral trade rules and promote trade development. It represents a collective effort to offer a “BRICS solution” for the restructuring of global supply chains, technological transformation, and sustainable development—contributing to the creation of a more resilient and inclusive world economic order.

Source:

[https://www.cnis.ac.cn/gjbzh/gjdt/202504/t20250416\\_59832.html](https://www.cnis.ac.cn/gjbzh/gjdt/202504/t20250416_59832.html)

# 11. China's Efforts on Global Standardization Cooperation

## #Standardization-Cooperation

1. On March 11, Deng Zhiyong, Vice Administrator of the State Administration for Market Regulation (SAMR), met in Beijing with Jens Heiede, Head of the **Danish Standards**. The two sides exchanged views on China-Denmark cooperation in the field of standardization.

Mr. Deng noted that this year marks the 75th anniversary of diplomatic relations between China and Denmark. Continuing to advance bilateral cooperation in standardization will help inject new momentum into the deepening of bilateral relations. He expressed hope for more pragmatic cooperation in areas such as **green transition, circular economy, and maritime and shipbuilding industries**.

Officials from relevant departments of SAMR also attended the meeting.

2. On April 11, Luo Wen, Administrator of the State Administration for Market Regulation (SAMR), met with Akmal Jumanazarov, Head of the **Uzbek Agency for Technical Regulation**, and his delegation during their visit to China.

Mr. Luo stated that under the strategic guidance of President Xi Jinping and President Mirziyoyev, China-

Uzbekistan relations have maintained strong development momentum. He emphasized that China is committed to enhancing exchanges and cooperation with Uzbekistan in areas such as **product quality and safety supervision, metrology, standardization, and conformity assessment**, turning the consensus reached by the two heads of state into concrete actions and tangible outcomes.

Following the meeting, Mr. Luo and Mr. Jumanazarov jointly signed three cooperation documents between the two agencies covering **product quality and safety regulation and standardization**.

During the visit of the delegation from the Uzbek Agency for Technical Regulation to the State Administration for Market Regulation (SAMR) of China, a **Memorandum of Understanding on Enhancing Cooperation in Accreditation** was signed between the China National Accreditation Service for Conformity Assessment (CNAS) and the Uzbekistan Accreditation Center. The signing took place in the presence of Mr. Luo Wen, Administrator of SAMR, and Mr. Jumanazarov, Head of the Uzbek Agency for Technical Regulation. The MoU was signed by Zhang Zhaohua, Director of CNAS, and Zakirov, Director of the Center of Accreditation of

Uzbekistan.

The Center of Accreditation of Uzbekistan is the sole national accreditation body of the country. According to the MoU, the two accreditation bodies will engage in various forms of cooperation, including information exchange, experience sharing, personnel exchanges, training seminars, and joint research and development. These efforts aim to provide technical support in accreditation for the high-quality joint construction of the Belt and Road Initiative and the interconnection of quality infrastructure between China and Uzbekistan.

**3.** Recently, Luo Wen, Administrator of the State Administration for Market Regulation (SAMR) of China, and Mr. Hem Vandy, Minister of Industry, Science, Technology and Innovation of the Kingdom of Cambodia, signed three Memorandums of Understanding:

- MoU on Cooperation in the Field of Metrology between SAMR and the Ministry of Industry, Science, Technology and Innovation of Cambodia
- MoU on Standardization Cooperation between SAMR (Standardization Administration of

China) and the Ministry of Industry, Science, Technology and Innovation of Cambodia

- MoU on Cooperation in the Field of Conformity Assessment between SAMR (Certification and Accreditation Administration of China) and the Ministry of Industry, Science, Technology and Innovation of Cambodia

These MoUs aim to deepen bilateral cooperation in the areas of **metrology**, **standardization**, and **conformity assessment** through technical collaboration and capacity building.

Source:

1. [https://www.samr.gov.cn/xw/zj/art/2025/art\\_bce0e5aa2dbd4286be1372fa96fd2872.html](https://www.samr.gov.cn/xw/zj/art/2025/art_bce0e5aa2dbd4286be1372fa96fd2872.html)
2. [https://www.samr.gov.cn/xw/zj/art/2025/art\\_8a25d8fc8b8a429183a9670f131d3ca7.html](https://www.samr.gov.cn/xw/zj/art/2025/art_8a25d8fc8b8a429183a9670f131d3ca7.html) & [https://www.cnas.org.cn/zxzx/rkwyhxx/art/2025/art\\_72964cd892c846169e3b5b8219185010.html](https://www.cnas.org.cn/zxzx/rkwyhxx/art/2025/art_72964cd892c846169e3b5b8219185010.html)
3. [https://www.samr.gov.cn/xw/zj/art/2025/art\\_c6ceb677a034fdc8dec8609a5c6fd5.html](https://www.samr.gov.cn/xw/zj/art/2025/art_c6ceb677a034fdc8dec8609a5c6fd5.html)

## 12. 2025 International Standardization Forum Held in China

#Standardization-Event

On April 16, the **2025 International Standardization (Chilin) Conference** grandly opened at the IEC International Standards Promotion Center in Nanjing, Jiangsu Province in China.

With the theme **“Towards Carbon Peak and Carbon Neutrality: International Carbon Footprint Standards Driving Green and Low-Carbon Development,”** the conference brought together nearly 100 academicians, experts, and senior officials from standardization organizations, along with close to 1,000 representatives from government agencies, research institutes, and enterprises for in-depth exchanges and discussions.

The following distinguished guests delivered remarks in succession:

- Jiang Min, Deputy Mayor of Nanjing,
- Jo Cops, IEC President,
- Bilel Jamoussi, ITU Telecommunication Standardization Bureau Deputy Director,

- Florian Spittler, DKE (German Commission for Electrical, Electronic & Information Technologies) Head of Liaison and Support and Executive Committee Member,
- Scott Steedman, BSI (British Standards Institution) Director of Standards,
- Chen Guoping, Deputy General Manager of State Grid Corporation of China,
- Hao Jinyu, Deputy General Manager of China Huaneng Group(中国华能集团),
- LvTingyan, Deputy General Manager of China Three Gorges Corporation(中国长江三峡集团),
- Zhu Meina, Deputy Director-General of the Metrology Department of the State Administration for Market Regulation.

Three standardization achievements were announced at the conference:

- The conference released two new IEC technology strategy white papers:

### “Smart Hydropower” and “New Photovoltaic Materials and Technologies.”

- An unveiling ceremony was held for the **VDE DKE Representative Office at the IEC International Standards Promotion Center in Nanjing, Jiangsu (China)**.
- Key initiatives of the **Jiangsu Provincial Product Carbon Footprint Public Service Platform** were showcased at the conference.

During the keynote report session:

Shu Yinbiao, Academician of the Chinese Academy of Engineering, 36th President of the IEC, and President of the Chinese Society for Electrical Engineering, shared research on a **“Four-in-One” framework (“四位一体”) for building a product carbon footprint standard accounting and certification system**.

Vimal Mahendru, IEC Vice President and Chair of the Standardization Management Board, elaborated on and emphasized the **critical role of carbon emission reduction in advancing sustainable development**.

Wang Jinnan, Academician of the Chinese Academy of Engineering, provided a detailed overview of the

### development history and current status of product carbon footprints.

Zhang Gang, former Counselor of the State Council and Vice Chair of the China Standardization Expert Committee, shared insights on **building a Quality Infrastructure (QI) for dual-carbon management systems**.

Shan Shewu, Chairman of the State Grid Electric Power Research Institute Co., Ltd., presented thoughts and practices on **electricity-carbon synergy and innovation within new power systems**.

Two thematic forums were held in parallel:

- One focused on **carbon footprint accounting and low-carbon transition practices in key industries**.
- The other explored **green technology innovation and digital empowerment**.

Experts and industry representatives shared progress and practical applications to jointly support the achievement of China’s “dual carbon” goals.

Source:

[https://mp.weixin.qq.com/s/xkZtr2Rj5F9spmkyJN\\_rZg](https://mp.weixin.qq.com/s/xkZtr2Rj5F9spmkyJN_rZg)

## 13. TC260 Organized its First Standards Week of 2025 in Suzhou, Jiangsu Province

#Standardization-Event

From April 15 to 17, 2025, the first “Standards Week” event of the year organized by the National Cybersecurity Standardization Technical Committee (TC260) was held in Suzhou, Jiangsu Province.

**Wang Jingtao**, Deputy Director of the Cyberspace Administration of China (CAC) and Chair of TC260, and **Liu Xiaotao**, Member of the Standing Committee of the Jiangsu Provincial Party Committee and Party Secretary of Suzhou, attended the event and delivered remarks.

Wang Jingtao emphasized that 2025 marks the **conclusion of China’s 14th Five-Year Plan and the strategic planning year for the 15th Five-Year Plan**. He urged the National Cybersecurity Standardization Technical Committee (TC260) to approach cybersecurity standardization with **high ambition, high standards, and high quality**. Mr. Wang specified four key directions:

- **Achieve comprehensive cybersecurity coverage** and actively contribute to a holistic national cybersecurity framework.
- **Emphasize the binding power of standards** to strongly support the implementation of laws and policies.
- **Balance development and security** to ensure the high-quality growth of emerging industries.
- **Uphold openness and innovation** by promoting China’s vision for cyberspace governance as a global consensus and contributing to the development of international rules.

Liu Xiaotao stated that Suzhou will prioritize accelerating the construction of its cybersecurity and data protection system and capabilities, and promote the integrated development of cybersecurity education,

technology, and industry. With the support of the CAC and the Jiangsu Provincial Cyberspace Administration, Suzhou will continue to deepen special cybersecurity initiatives, advance **pilot reforms such as data export security**, and forge new progress in institutional development, **standard research**, technological innovation, and industrial growth.

At the event, invited experts focused on key topics such as:

- **Large model applications,**
- **Next-generation communication technologies,**
- **Autonomous driving,**
- **Network resilience,**
- **Personal information protection compliance audits,**
- **Secure data erasure for electronic products,**
- **Privacy protection.**

They aligned discussions with China's core cybersecurity strategies, explored the **standardization needs of emerging technologies**, and **shared practices and developments in cybersecurity standards**.

The Standards Week event was co-hosted by the TC260 Secretariat, China Electronics Standardization Institute (CESI), and the Cyberspace Affairs Commission of the Suzhou Municipal Committee of the CPC. Over 800 participants attended, including TC260 members, working group leaders and deputy leaders, and representatives from member organizations.

During the event, four technical forums were held on:

- **AI security**
- **Critical information infrastructure protection**
- **Personal information protection**
- **Commercial cryptography standards and applications**

Additional activities included working group meetings, a preparatory meeting for the upcoming SC27 international conference, a national standards fundamentals training session, and a technical exchange on **cybersecurity standards implementation**.

Source:

<https://mp.weixin.qq.com/s/YjNo410pbCSJVKKpkw55Dg>



## Digital Transition

# 14. China Issued New Mandatory National Standard and Measures for the Labeling of Content Generated by Artificial Intelligence

#AI-Standard

On March 14, China released **Measures for the Labeling of Content Generated by Artificial Intelligence** (hereinafter referred to as “the Measures”). The Measures are jointly developed and issued by the Cyberspace Administration of China (CAC) and the Ministry of Industry and Information Technology (MIIT) and will take effect on September 1, 2025.

Since 2022, China has published [Provisions on the Administration of Deep Synthesis of Internet-based Information Service\(2022\)](#) and [Interim Measures for the Administration of Generative Artificial Intelligence Service\(2023\)](#), along with its Cybersecurity Law (2017), the country has established its AI-generated content governance framework. A shared similarity among the three legal documents is their emphasis on having a labeling system to help the public and network service providers differentiate between content generated by AI and humans. The release of the Measures in 2025 is a response to this calling, offering detailed provisions that put labeling methods into real-life practice.

The Measures introduce a dual-labeling system of explicit and implicit labeling for AI-generated content. Its primary target is network information providers whose products and services involve AI-generated content. The measures have designated responsibilities for different network information providers to fulfill.

Generally, service providers must display visible marks on any AI-generated content and embed machine-readable metadata containing content attributes, provider identification, and unique content codes. Content distribution platforms bear specific verification responsibilities, including checking for proper labeling, adding appropriate warnings when redistributing content, and providing user tools for self-identification. The Measures also touch on online application matters. Online application distribution platforms should verify if the application contains AI-generated content or such services and examine if the application complies with the mandatory labeling requirements in a new national standard issued before the Measure.

Before the release of the Measures, **GB 45438-2025 Cybersecurity Technology – Labeling Method for Content Generated by Artificial Intelligence** (hereinafter referred to as “Labeling Method”) was published on February 28, 2025. It is a mandatory national standard. This standard document took reference from **GB 18030-2022 Information Technology – Chinese coded Character Set**. It was proposed and is under the jurisdiction of the Central Cyberspace Affairs Commission Office.

The Labeling Method provides a detailed definition of the explicit and implicit labeling:

- Explicit labeling refers to identifiers added to AI-generated content or interactive interfaces, presented in forms such as text, audio, or graphics (including static graphics, videos, virtual and interactive scenes) that can be perceived by users. Its primary purpose is to notify the public that the content is generated or synthesized by AI.
- Implicit labeling refers to identifiers embedded within the file data of AI-generated content through technical measures, which are not easily noticeable to users. Its primary purpose is to record relevant information about the generated or synthesized content.

Moreover, this standard has specified the format, components, placement, color, and clarity requirements of the explicit label. Explanations on how to embed implicit labels into the file’s data and record security protection information such as identifier integrity and content consistency are also included in the document. The standard has provided visual examples for service providers to understand the actual implementation of this new mandatory national standard.

To allow enterprises to fully understand and implement this labeling method, the Measures give them a six-month transition period. Once the Measures come into effect officially in September, a review of labeling will be a key focus area for relevant regulatory bodies. However, as the first set of the labeling method in this

country, the direction of the measures may not only stay at the differentiation of content. The Measures may undergo further adjustments by incorporating lessons and experience learned along the implementation process. European stakeholders are

advised to keep a close watch on their changes and provide feedback to SESEC during consultation

Source: [https://www.cac.gov.cn/2025-03/14/c\\_1743654685899683.htm](https://www.cac.gov.cn/2025-03/14/c_1743654685899683.htm)

## 15. China Releases Its First Security Management Measures on the Application of Facial Recognition Technology

#Cybersecurity #Personal Information

On 21 March 2025, the Cyberspace Administration of China (CAC) and the Ministry of Public Security jointly released ***Security Management Measures for the Application of Facial Recognition Industry*** (hereinafter referred to as “the Measures”). This is China’s first set of legally binding rules applicable to facial recognition technology (FRT) and will take effect from **June 1, 2025**.

The Measures stipulate the general processing rules and requirements for using FRT to handle facial information, security norms for the application of FRT, and responsibilities for supervision and management.

Any activities utilizing FRT to process facial information and identify Individuals in China will be regulated by these measures, except in the following two scenarios:

1. Using facial recognition technology for research,
2. Algorithm training purposes in China.

The purpose of the exemption is to not hamper innovation and development of FRT while enhancing the protection for individuals.

SESEC has extracted a few key points to take note of in this new measure. Several provisions listed below reflects China’s perspectives on protecting individuals’ rights and interests:

### I. China’s Restriction on FRT Installation

The measures specify that FRT installation is limited to public areas and must be for the purpose of safeguarding public security. Any area where facial information is being detected must display clear signage to inform individuals that they are entering a monitored zone. FRT installation in private spaces within the public area—such as hotel rooms or changing rooms is strictly prohibited.

### II. Fully Informed Consent from Individuals

As stated in the Measures, companies should clearly identify specific purposes and necessities of using FRT before its adoption and minimize potential impact of FRT usage on individual’s rights and interests. Companies must truthfully, accurately and fully inform individuals about the following matters in clear and simple language:

1. The name or identity and contact information of the personal information processor,
2. The purpose and method of processing facial recognition information, and the retention period of the processed information,
3. The necessity of processing facial recognition information and its impact on personal rights and interests,
4. The methods and procedures for individuals to legally exercise their rights,
5. Other matters that should be informed according to laws or administrative regulations.

Processing facial information must only proceed after obtaining separate consent from a fully informed individual. Moreover, the individuals' consent must be provided in written form.

The Measures particularly highlight that for minors under the age of 14, consent must be obtained from their parents or guardians. Additionally, a separate regulation containing more detailed provisions on the storage, usage, transfer and disclosure of minors' facial information will be developed.

### **III. Storage Requirements of Facial Information**

Facial or biometric information should only be stored in local devices. Cloud storage is prohibited to prevent large-scale personal information leaks. The storage period of facial information must not exceed the minimum time required to achieve the intended purpose.

### **IV. Impact Assessment Before Adopting FRT**

Prior to performing facial or biometric information using FRT, companies should conduct a thorough impact assessment regarding personal information protection and maintain processing records. The assessment report and processing records must be kept for at least three years. The assessment must address the following aspects:

1. Whether the purpose or method of processing facial information is legal, legitimate, and necessary
2. The impact on personal rights or interests and the effectiveness of measures to mitigate adverse effects.
3. The risk of facial information being leaked, tampered with, lost, damaged, illegally acquired, sold, or used, and the potential harm this may cause.
4. Whether the protective measures taken are legal, effective, and appropriate to the level of risk.

### **V. Facial Recognition Cannot Be the Only Option**

FRT must not be the sole verification method when other non-biometric verification technology is available. However, as long as alternative non-biometric option is provided, FRT can still be used as the preferred method.

Companies must not mislead, deceive or coerce individuals into surrendering their facial information with the purpose of Individuals retain the right to withdraw their consent at any time, and companies shall provide alternative, appropriate, and convenient options.

### **VI. Filing with Local Cyberspace Authorities**

Companies must monitor the volume of stored facial information. When this accumulation reaches 100,000, companies must immediately file with the local provincial- or higher-level cyberspace authorities within 30 working days from that date. The following materials must be submitted for filing:

1. Basic information of the personal information processor,
2. The purpose and method of processing facial information,
3. The amount of facial information stored and security protection measures,
4. The processing rules and operating procedures for facial information,
5. The personal information protection impact assessment report.

Companies must prepare for the filing from day one as these materials should have clearly specified the necessity and legality of their FRT use. Any ambiguity found within the submitted materials will result in rejection of the filing.

As the first regulatory rules targeting facial recognition technology, the Measures fill in a critical void in China's existing cybersecurity legal framework by establishing a regulatory framework for an emerging and rapidly evolving technology. However, significant uncertainties remain throughout the entire implementation process, such as internal restructuring and adjustments required of relevant stakeholders, impact assessment and record-keeping, as

well as preparation and submission of filling materials. Real-life implementation will be more complex with variations on a case-by-case basis. Further revisions are likely as more and more issues will emerge in the practice.

Access the original legal document of the Measure (*in Chinese*) via this link:

[https://www.cac.gov.cn/2025-03/21/c\\_1744174262156096.htm](https://www.cac.gov.cn/2025-03/21/c_1744174262156096.htm)

Access the press release of the CAC on deciphering the Measure (*in Chinese*) via this link:

[https://www.cac.gov.cn/2025-03/21/c\\_1744259774719484.htm](https://www.cac.gov.cn/2025-03/21/c_1744259774719484.htm)

Source: [https://www.cac.gov.cn/2025-03/21/c\\_1744174262342111.htm](https://www.cac.gov.cn/2025-03/21/c_1744174262342111.htm)

## 16. China Releases Development Report on Product Digital Passport Technology (2025)

# Digital-Product-Passport

On April 25, 2025, the International Seminar on Product Digital Passport (DPP) was successfully held in Nanjing, Jiangsu Province. The event was hosted by the People's Government of Xuanwu District, Nanjing, co-organized by the China Academy of Information and Communications Technology (CAICT) and Jiangsu International Data Port and supported by institutions including the China National Institute of Standardization (CNIS).

During the seminar, Wu Tong, Deputy Director of the Department of Consumer Goods Industry at the Ministry of Industry and Information Technology (MIIT), Li Wenwu, Director of the Institute of Advanced Technology Standardization of CNIS, and Jin Jian, Director of the Industrial Internet and IoT Research Institute at CAICT, jointly released the **Product Digital Passport (DPP) Technology Development Report (2025)**.

The DPP Technology Development Report (2025) outlines a clear understanding of product digital passports, systematically reviews the latest international and domestic developments in policies, standards, and industry, and provides insights into global trends. It proposes an overall framework and development roadmap for DPP implementation in China, aiming to serve as a reference for accelerating the establishment of a DPP system and advancing the digital and green transformation of industry.

At the seminar, Li Wenwu, Director of the Institute of Advanced Technology Standardization at the China National Institute of Standardization (CNIS) and co-organizer of the **ISO Preliminary Work Item (PWI) 25534-1 Product Digital Passport – Part 1: Overview and Fundamental Principles**, delivered a keynote speech titled **“Exploring the International Standardization of Product Digital Passports (DPP)”**.

Focusing on four key areas—**regional practices, core challenges, standardization breakthroughs, and outlook**, explored potential development paths for DPP international standardization and discussed the proposed scope of ISO/PWI 25534-1.

Ms. Zhang Yan, Co-convenor of ISO Joint Working Group 9 (JWG 9) under ISO/TC 154 Processes, data elements and documents in commerce, industry and administration and the United Nations Economic Commission for Europe (UNECE), provided an overview of the current organizational structure and latest developments in international standardization efforts for the Product Digital Passport (DPP). Her presentation was grounded in the collaborative mechanism between ISO/TC 154 and UNECE.

Mr. Gerhard, Co-organizer of the ISO preliminary work item, offered an in-depth analysis of global progress and practices in DPP development. He highlighted the latest trends, ongoing standardization efforts, and exploration applications around the world. He emphasized that while the international standardization of DPP poses challenges,

it also presents significant opportunities. As the world's largest manufacturing economy and a major market for digital technology applications, China should not only accelerate the export of standards in its competitive sectors—such as power batteries and photovoltaics—but also champion the concept of “**inclusive standards**” through initiatives like ISO/PWI 25534-1. This would support the development of a globally connected yet industry-specific harmonization framework, described as “one global network, thousands of industry solutions.”

Looking ahead, the China National Institute of Standardization (CNIS) has expressed that the organization will continue to work with stakeholders in an open and inclusive manner to actively promote the international standardization of DPPs. CNIS will strengthen its role in coordination and organization, accelerating the development of DPP international standards and contributing to the advancement of global sustainable development. SESEC will constantly engage with Chinese counterparts and follow China's DPP progress closely, providing timely updates.

Source: [https://www.cnis.ac.cn/gnbzh/gndt/202504/t20250428\\_59925.html](https://www.cnis.ac.cn/gnbzh/gndt/202504/t20250428_59925.html)

## 17. 2025 Intelligent Manufacturing Standardization Kickoff Meeting Held in Beijing

# Digitalization

On March 6, 2025, the 2025 first working meeting of the Overall Group for National Intelligent Manufacturing Standardization was held in Beijing. Zhao Fengjie, Director of the Intelligent Manufacturing Division of the Department of Equipment Industry I of the MIIT, attended the meeting and delivered a speech. Fan Kefeng, Deputy President of the China Electronics Standardization Institute (CESI), delivered a welcome speech on behalf of the leading organization of the Overall Group. Nearly 40 participants attended the meeting, including representatives from the deputy leading organizations such as the Instrumentation Technology and Economy Institute (ITEI), China Academy of Information and Communications Technology (CAICT), China National Institute of Standardization (CNIS), Shanghai Institute of Process Automation and Instrumentation Research, and China General Technology Machine Tool Research Institute; representatives from the standardization technical committees of 14 key industries such as automotive, machine tools, rail transportation, steel, and home appliances; and standardization leaders from companies such as Huawei, CRRC, Haier, and SmartMore.

Director Zhao Fengjie pointed out that after a decade of exploration, standardization in intelligent manufacturing has achieved significant breakthroughs in the application-oriented standards domain, but foundational standards still need to be strengthened, and the application ecosystem of standard clusters urgently requires improvement. He emphasized that the Overall Group should seize the opportunity of the

new round of technological revolution and industrial transformation to promptly propose a new version of the Intelligent Manufacturing System Architecture. This includes **forward-looking planning in cutting-edge areas such as industrial intelligence and cloud-based control systems, accelerating efforts to address key shortcomings in areas like industrial data dictionaries, industrial communication protocols, and factory operating systems**. He also called for the development of tools for standards conformity assessment, to promote broader adoption of standardization outcomes across enterprises. Moreover, he stressed that the Overall Group should continue to **leverage international platforms such as China-Germany cooperation and BRICS cooperation**, put forward more international standard proposals, and enhance China's global influence in intelligent manufacturing.

During the meeting, experts from the advisory group engaged in in-depth discussions around the theme of “Upgrading Intelligent Manufacturing Standardization.” They unanimously called for accelerating the development of standards for integrated applications of artificial intelligence, strengthening standard layouts in areas such as **intelligent products, advanced manufacturing technologies, and industrial model innovation**, and actively cultivating standardization promotion organizations.

Representatives from the Standardization technical committees in 14 industries offered targeted suggestions based on industry practices, emphasizing

the need to deepen the integration of standards with specific application scenarios. For example:

- The National Technical Committee for Automotive Standardization (TC114) proposed formulating standards for **dynamic reconfiguration of intelligent manufacturing production lines** in response to demands for flexible manufacturing and customized production.
- The National Technical Committee for Metal Cutting Machine Tool Standardization (TC22) recommended establishing a “Smart Equipment Standards Research Group” to **define intelligent machine tools and their functional distinctions**, thereby enhancing the competitiveness of domestic high-end equipment. They also proposed joint efforts with the National Technology Standard Innovation Base for standards development and promotion.
- A representative from the China Household Electric Appliance Research Institute suggested developing standards for personalized customization and online monitoring of production quality in the appliance sector, aiming to build a comprehensive standard system for the industry.
- The National Technical Committee for Building Materials Equipment Standardization (TC465) noted that leading enterprises in sectors like

cement and glass have begun developing enterprise-level intelligent factory standards. They suggested strengthening guidance to align enterprise standards with national and sector standards.

- Enterprises such as Huawei and SmartMore proposed building a standard service platform for industrial intelligence, offering standardized solutions for typical scenarios like AI-based quality inspection and predictive maintenance.

The Overall Group for National Intelligent Manufacturing Standardization is the key coordinating body for China’s intelligent manufacturing standardization efforts. It has played a central role in establishing the foundational framework for standard development in this sector. The recent meeting highlighted China’s growing commitment to addressing existing weaknesses, promoting the practical application of standards, and expanding its global influence in the field. As the group moves toward updating China’s intelligent manufacturing standards system—with greater integration of artificial intelligence—European stakeholders are encouraged to strengthen dialogue and actively participate in the process. This will help facilitate EU-China standard harmonization and ensure mutual compatibility in future industrial ecosystems.

Source: <https://www.cesi.cn/202503/10914.html>



## Green Transition

# 18. China Releases Guidelines for Product Carbon Footprint Accounting

# Carbon Footprint Accounting

From March 3 to 12, 2025, the China National Institute of Standardization (CNIS) is soliciting public comments on revised implementation rules for energy efficiency labeling of the following products: **microcomputers, high-voltage three-phase cage induction motors, air purifiers, and permanent magnet synchronous motors.**

These revisions aim to align the implementation rules with updates to the corresponding mandatory standards for each product category. The updates are as follows:

- The new version of GB 28380-2025 Minimum Allowable Values of Energy Efficiency and Energy Efficiency Grades for Microcomputers, was released on January 24, 2025, and will take effect on February 1, 2026.
- The new version of GB 30254-2024 Minimum Allowable Values of Energy Efficiency and Energy Efficiency Grades for Cage Three-Phase High-Voltage Induction Motors, was released on August 23, 2024, and will take effect on September 1, 2025.
- The new version of GB 36893-2024 Minimum Allowable Values of Energy Efficiency and Energy Efficiency Grades for Air Cleaner, was released on September 29, 2024, and will take effect on October 1, 2025.
- The new version of GB 30253-2024 Minimum Allowable Values of Energy Efficiency and Energy Efficiency Grades for Permanent Magnet Synchronous Motors was released on September 29, 2024, and will take effect on October 1, 2025.

Energy efficiency labeling is one of China's mandatory product access schemes. Products falling under this scheme must comply with the energy efficiency requirements of the relevant mandatory standards and, in accordance with the implementation rules, undergo testing, labeling, and filing before they can be placed on the Chinese market. Therefore, European stakeholders are advised to review the changes in the updated implementation rules to prepare for proper labeling and ensure compliance.

Download links (in Chinese) for the implementation rules:

1. Implementation Rules for Energy Efficiency Labeling of Microcomputers:  
<https://www.energylabel.com.cn/detail?typeId=2&id=234>
2. Implementation Rules for Energy Efficiency Labeling of High-Voltage Three-Phase Cage Induction Motors:  
<https://www.energylabel.com.cn/detail?typeId=2&id=235>
3. Implementation Rules for Energy Efficiency Labeling of Air Purifiers:  
<https://www.energylabel.com.cn/detail?typeId=2&id=228>
4. Implementation Rules for Energy Efficiency Labeling of Permanent Magnet Synchronous Motors:  
<https://www.energylabel.com.cn/detail?typeId=2&id=229>

## 19. New Mandatory Standard for China RoHS Near Completion

### # RoHS

Beijing, March 14, 2025 - China is one step closer to formalizing its first mandatory national standard on hazardous substance restrictions in electrical and electronic products (EEPs). A technical review meeting for the draft standard, titled “**Requirements on the Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Products**” (Plan No. 20231685-Q-339), was recently held 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 China.

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**. These products must comply with both the substance restriction limits and related labeling requirements.
- Category 2: Products not listed in the catalogue. These are only subject to labeling requirements.

During the previous round of public consultation in late 2024, the draft standard’s section on conformity assessment requirements—which was expected to impose significant compliance obligations—faced strong opposition from industry stakeholders. In response, this section was removed from the current draft, contributing to its smooth passage through the technical review.

**In terms of substance restrictions, 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.

Overall, the release of this standard will mark a milestone in China’s efforts to streamline and strengthen its RoHS compliance system. Before formal approval, a final round of public consultation is typically conducted. European stakeholders and industry participants are encouraged to closely follow this process and provide feedback to ensure their interests are reflected.

## 20. China Enforces New Mandatory Standards for Food Contact Materials

### #Food-Contact-Material

Beijing, March 2025 — China has updated several key mandatory national standards for food contact materials under the GB 4806 series. These revised standards have already entered into force, and compliance is now mandatory. All food contact materials and articles placed on the Chinese market must now comply with these updated requirements.

The GB 4806 updates introduce substantial revisions and technical changes, replacing multiple standards from the earlier GB 4806-2016 series. Alongside these revisions, several entirely new standards have been introduced to address emerging categories of materials, including adhesives, inks, and composite products used in food contact applications.

### Overview of the Changes of the GB 4806 Series Standards

Standards Title & No.	Effective or Replaced by Newly Developed Standard	Implementation dates
GB 4806.1-2016 National Food Safety Standard – General Safety Requirements for Food Contact Materials and Articles	Effective	October 2017
GB 4806.2-2015 National Food Safety Standard – Nipples	Effective	September 2016
GB 4806.3-2016 National Food Safety Standard – Enamelware	Effective	April 2017
GB 4806.4-2016 National Food Safety Standard – Ceramic Products	Effective	April 2017
GB 4806.5-2016 National Food Safety Standard – Glass Products	Effective	April 2017
GB 4806.6-2016 National Food Safety Standard – Plastic Resins for Food Contact Use	GB 4806.7-2023: National Food Safety Standard – Plastic Materials and Articles for Food Contact Use	September 2024
GB 4806.7-2016 National Food Safety Standard – Plastic Materials and Articles for Food Contact Use		
GB 4806.8-2016 National Food Safety Standard – Paper and Paperboard Materials and Articles for Food Contact Use	GB 4806.8-2023: National Food Safety Standard – Paper and Paperboard Materials and Articles for Food Contact Use	June 2023
GB 4806.9-2016 National Food Safety Standard – Metal Materials and Articles for Food Contact Use	GB 4806.9-2023: National Food Safety Standard – Metal Materials and Articles for Food Contact Use	September 2024
GB 4806.10-2016 National Food Safety Standard – Coatings and Coating Layers for Food Contact Use	Effective	April 2017
GB 4806.11-2016 National Food Safety Standard – Rubber Materials and Articles for Food Contact Use	partially replaced by GB 4806.11-2023 National Food Safety Standard – Rubber Materials and Articles for Food Contact Use (for materials made from natural or synthetic rubber, including vulcanized thermoplastic elastomers); still effective for materials made mainly from silicone rubber	September 2024
	GB 4806.12-2022 National Food Safety Standard – Bamboo and Wooden Materials and Articles for Food Contact Use	December 2022
GB 9683-1988 Hygienic Standard for Composite Food Packaging Bags	GB 4806.13-2023 National Food Safety Standard – Composite Materials and Articles for Food	September 2024

	Contact Use	
	GB 4806.14-2023 National Food Safety Standard – Inks for Food Contact Materials and Articles	September 2024
	GB 4806.15-2024 National Food Safety Standard – Adhesives for Food Contact Materials and Articles	February 2025

## Industry Impact

The Chinese authorities have clarified that earlier versions of the GB 4806 standards are no longer valid. Continued use of outdated test reports or conformity assessment procedures may result in serious consequences, including:

- Refusal of market access
- Delays at Chinese customs
- Potential product recalls or enforcement actions within the Chinese market

## Call to Action for European Stakeholders

European standardization organizations, national committees, and industry associations are urged to take immediate action. Key recommendations include:

- Disseminate information to manufacturers, exporters, testing bodies, and certification service providers.
- Advise enterprises to assess their current compliance against the updated GB 4806 series.
- Encourage collaboration with accredited testing laboratories in China to ensure updated conformity testing.
- Facilitate technical exchange with Chinese counterparts to understand critical changes and alignment challenges with international practices.

# 21. CNCA Issued First General Implementation Rules for Product Carbon Footprint Labeling Certification

# Product-Carbon-Footprint

On March 20, the National Certification and Accreditation Administration of China (CNCA) issued the General Implementation Rules for Product Carbon Footprint Labeling Certification (Trial) (hereinafter referred to as the “General Implementation Rules”), which is the country’s first systematic document on product carbon footprint labeling certification and has taken effect from the date of issuance. The document is applicable to products falling under the catalogue of the [product carbon footprint labeling certification’s pilot program](#) published by CNCA in 2024, while other products may use the General Implementation Rules as a reference for their own labeling certification activities.

The General Implementation Rules clearly specify that certification bodies should fulfill the selection criteria of the product carbon footprint labeling pilot program and be accredited by CNCA. The certification bodies should

also possess at least 10 certification personnel with a minimum of 2 years of working experience in product carbon footprint. The certification model comprises three main parts: preliminary examination, product carbon footprint review, and continuous monitoring after certification. The certification process consists of 10 steps and could take up to 90 days.

In addition, the certification process involves a field inspection which includes a review of the product carbon footprint. The review shall be performed in accordance with principles and procedures in the Annex 2 of the General Implementation Rules: **Guideline of Product Carbon Footprint Review**, and in compliance with the requirements of **GB/T 24076-2024 Greenhouse Gas – Product Carbon Footprint – Quantification Requirements and Guidelines**.

The document also reveals the official product carbon footprint label, which features a green-themed design and displays a “footprint” pattern to represent the carbon footprint concept (as seen in the sample picture below). The quantified carbon footprint results of the product should be displayed in Arabic numeral format with the unit of kg CO<sub>2</sub>e. A QR code should be attached below the label to access detailed information about the product certification (shown as a grey-colored square in the sample).



Ever since China issued the *Opinions on Accelerating the Establishment of a Product Carbon Footprint Management System* in 2023, the country has published **GB/T 24076-2024** in August 2024 and established the country’s first Carbon Footprint Accounting System.

On 9 September 2024, the country initiated its first product carbon footprint certification pilot program, aiming to implement product carbon footprint labeling certification in qualified regions and mature industries. The primary goal of this pilot was to develop a unified, reliable system for product carbon footprint labeling and certification. The creation of the General Implementation Rules incorporates the results and experiences learned from the pilot program. As of now, the rudimentary form of China’s product carbon footprint certification system has taken shape.

Notably, the document has repeatedly mentioned that the trial implementation rules serve as a supporting document for specific implementation rules. In other words, this document is a set of horizontal rules to establish the working framework for product carbon footprint labeling certification. China will continue to issue more detailed requirements and review criteria for specific products in the future to further enrich this certification system. SESEC will continue to monitor its development and report the latest updates.

Source:

[https://www.cnca.gov.cn/zwx/gg/2025/art/2025/art\\_5fc5d46ee1fc4ae7bbfbd55b11572496.html](https://www.cnca.gov.cn/zwx/gg/2025/art/2025/art_5fc5d46ee1fc4ae7bbfbd55b11572496.html)

## 22. Draft for Approval of New China RoHS Compulsory Standard under Call for Comments

#RoHS

On April 14, 2025, The Ministry of Industry and Information Technology (MIIT) of China has completed the drafting of the mandatory national standard titled *Requirements for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products (final draft for approval)*. To further solicit public opinions, the draft for approval and its explanatory notes are published for public consultation. The deadline for feedback is **April 21, 2025**.

Overview of the Development of the Mandatory National Standard under China RoHS by SESEC is as below

### 1. Regulatory Background and Evolution

“China RoHS” refers to the *Regulations for the Administration on the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products*, which aim to restrict the use of certain hazardous substances in electrical and electronic products, promote environmental protection, and advance green manufacturing. The initial version was implemented in 2006 (RoHS 1), with the current version (RoHS 2) in effect from July 1, 2016. The framework aligns closely with the EU RoHS 2 Directive (2011/65/EU).

## 2. Launch of Mandatory National Standard Project

On December 28, 2023, the Standardization Administration of China (SAC) issued the project approval for a new mandatory national standard titled ***Requirements for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products (Project No. 20231685-Q-339)***. The project was initiated by the Ministry of Industry and Information Technology (MIIT) and organized by SAC/TC297/SC3, with the China Electronics Standardization Institute (CESI) leading the drafting. The planned development cycle is 16 months.

## 3. Call for Drafting Organizations and Project Kick-off

In early 2024, SAC/TC297/SC3 publicly solicited interested parties to join the drafting process. A working group composed of enterprises, industry associations, research institutions, and testing/certification bodies was established. The kick-off meeting was held on March 20, 2024, officially launching the drafting phase.

## 4. Public Consultation and Technical Review

A draft for public consultation was completed in October 2024 and submitted to the MIIT's Department of Energy Conservation and Comprehensive Utilization. From November 2024 to January 2025, the MIIT's Department of Science and Technology launched a public consultation. On March 16, 2025, SAC/TC297/SC3 held a full committee review meeting (online), and a final version was submitted for approval after incorporating expert feedback.

## 5. Purpose and Issues Addressed by the Standard

The new standard addresses the gap between mandatory regulations and their supporting voluntary standards (GB/T 26572-2011 and SJ/T 11364-2014). These voluntary standards lack legal enforceability, leading to poor implementation, compliance misunderstandings, and difficulties in regulatory enforcement. The revision aims to consolidate the two standards into a single, **mandatory national standard** to ensure consistency with legal obligations and improve enforceability.

## 6. Technical Content and Alignment with International Practices

The standard covers 10 restricted substances—lead, mercury, cadmium, hexavalent chromium, polybrominated biphenyls (PBB), polybrominated diphenyl ethers (PBDE), and four phthalates (DEHP, DBP, BBP, DIBP)—**with limit values consistent with those in the EU RoHS Directive (2011/65/EU), ensuring international alignment**

## 7. Scope and Standard Integration

This new standard will integrate and replace GB/T 26572-2011 (including its amendment) and is expected to render SJ/T 11364-2024 obsolete. It applies to all electrical and electronic products falling under the scope of China RoHS, not limited to specific categories.

## 8. Implementation Timeline and Transition Period

A two-year transition period is proposed following the standard's official release to allow enterprises sufficient time to adapt. Additionally, a one-year grace period is suggested for stock products manufactured or imported before the implementation date, enabling smooth market transition.

## 9. Conformity Assessment and Supporting Measures

This standard applies to all products within the scope of China RoHS without conformity assessment methods inside. For products listed in the **Conformity Management Catalogue**, enterprises must follow applicable conformity assessment procedures, including the ***Implementation Plan for the Conformity Assessment System, Voluntary Certification Rules, or Supplier Declaration of Conformity Rules***. The new mandatory standard will serve as a legally binding technical basis for enforcement, improving regulatory clarity and effectiveness.

SESEC has followed this standard drafting process since the beginning of 2024. SESEC translated the Drafts for Comments and distributed them to EU stakeholders in late 2024. The previous news items on this subject are listed below.

[Mandatory Standard Draft Revised at China RoHS Working Meeting](#)

[China Calls for Comment on Revised RoHS Standard](#)[New Mandatory Standard for China RoHS Nears Completion – sesec.eu](#)

As the commenting period is really short, SESEC team cannot provide the translation of the draft but made the summary as above.

Source: <https://www.cesi.cn/202503/10941.html>

## 23. China Solicits Comments for Seven Mandatory National Standard Projects for Energy Efficiency

# Energy-Efficiency

On March 17, 2025, the National Standard Administration (SAC) announced a proposal to draft 3 mandatory national standards and revise 4 existing mandatory national standards for energy efficiency. The drafting and revision work will be led by the National Energy and Standards and Management Technical Committee (SAC/TC 20). The proposed standardization plan has been open for public comments from 17 March to 16 April 2025.

The new mandatory standards to be developed will cover:

- Mono-crystalline,
- Lithium-ion battery system,
- Household and similar health appliances and sports appliances.

Whereas the revision of existing mandatory standards will cover:

- Polyoxymethylene,
- Data centers,
- Displacement air compressors,
- Room air conditioners.

A list of the 7 standards is provided below:

No.	Standard Name	New Draft/Revision	Standards to be replaced	Public Consultation Period
1	Norm of energy consumption per unit production of mono-crystalline	New Draft		17 March 2025 – 16 April 2025
2	Minimum allowable values of energy efficiency and energy efficiency grades for lithium-ion battery system	New Draft		17 March 2025 – 16 April 2025

3	Minimum allowable values of the energy efficiency and energy efficiency grades for household and similar health appliances and sports appliances	New Draft		17 March 2025 – 16 April 2025
4	Norm of energy consumption per unit production of polyoxymethylene	Revision	GB 29438-2012	17 March 2025 – 16 April 2025
5	Minimum allowable values of energy efficiency and energy efficiency grades for data centers	Revision	GB 40879-2021-	17 March 2025 – 16 April 2025
6	Minimum allowable values of energy efficiency and energy efficiency grades for displacement air compressors	Revision	GB 19153-2019	17 March 2025 – 16 April 2025
7	Minimum allowable values of the energy efficiency and energy efficiency grades for room air conditioners	Revision	GB 21455-2019	17 March 2025 – 16 April 2025

Mandatory energy efficiency standards have been a key market requirement for products entering the Chinese market. We recommend that relevant manufacturers and industry stakeholders keep a close watch over the progress of these standardization projects.

SESEC will continue to track developments of the projects and provide timely updates, including information on standardization progress and relevant reference materials to help stakeholders better understand the direction of standardization in China.

Below are links containing proposals of each standard documents (**in Chinese**). Each proposal contains information regarding the purpose, scope and technical content of the standard. European stakeholders are welcome to provide comments and feedback regarding the standard projects during consultation with SESEC.

Click the link to view:

1. [Mono-crystalline,](#)
2. [Lithium-ion battery system](#)
3. [Household and similar health appliance and sports appliance,](#)
4. [Polyoxymethylene,](#)
5. [Data centers,](#)
6. [Displacement air compressors,](#)
7. [Room air conditioners.](#)



## Others

# 24. Cryptographic Module for PLC Controllers Plus Other Three Products Are Added to China Commercial Cryptography Product Certification Catalogue

#Cryptography

On March 19, 2025, China's State Administration for Market Regulation (SAMR) and the Office of State Cryptography Administration (OSCCA) jointly released the **Commercial Cryptography Product Certification Catalogue (Third Batch)**. This announcement marks a significant step forward in expanding the scope of mandatory certification for commercial cryptographic products in line with the **Cryptography Law of the People's Republic of China**.

The third batch aims to strengthen the implementation of cryptographic certification, promote product standardization, and better address the evolving needs of industry and information security. Issued pursuant to the **Implementation Opinions on Carrying Out Commercial Cryptography Testing and Certification Work (SAMR & OSCCA Joint Document No. 50 [2020])**, this batch officially takes effect from the date of its release.

### Products Listed in the Third Batch

The newly added product categories reflect China's continued focus on identity-based encryption, secure industrial control, and modern communication protocols. They include:

#### 1. Key Management System Based on SM9 Identity-Based Cryptography Algorithm

— A system managing identity keys using the SM9 algorithm.

**Standard: GM/T 0086 Technical Specification for Key Management System Based on SM9 Identity-Based Cryptography Algorithm**

#### 2. Cryptographic Module for PLC Controllers

— A cryptographic device integrated into industrial PLC control systems for key storage and secure communication.

**Standards: GM/T 0119 Technical Specification for Cryptographic Application in PLC Control Systems and Controllers; GM/T 0028 Technical Requirements for Cryptographic Module Security**

#### 3. DTLCP Cryptographic Module

— A module that establishes secure communication based on the Datagram Transport Layer Cryptographic Protocol.

**Standards: GM/T 0128 Specification for Datagram Transport Layer Cryptographic Protocol, GM/T 0028 Technical Requirements for Cryptographic Module Security**

#### 4. SSH Client and Server Cryptographic Modules

— Devices that enable secure remote login and encrypted network services based on the SSH protocol.

**Standards: GM/T 0129 Specification for SSH Cryptographic Protocol; GM/T 0028 Technical Requirements for Cryptographic Module Security**

The cryptographic algorithms used in the above products shall comply with the national cryptography administration requirements, including but are not limited to the following standards:

- GM/T 0001 Zuchongzhi Sequence Cryptographic Algorithm
- GM/T 0002 SM4 Block Cipher Algorithm
- GM/T 0003 SM2 Elliptic Curve Public Key Cryptographic Algorithm
- GM/T 0004 SM3 Cryptographic Hash Algorithm

- GM/T 0009 *Specification for the Use of the SM2 Cryptographic Algorithm*
- GM/T 0010 *Encryption and Signature Message Syntax Specification of the SM2 Cryptographic Algorithm*
- GM/T 0044 *SM9 Identity-Based Cryptographic Algorithm*

Random number testing for the above products shall follow the standards:

- GM/T 0005 Specification for Randomness Testing
- GM/T 0062 Requirements for Random Number Testing of Cryptographic Products

Unless otherwise specified, the latest version of the above standards (including all amendments) shall apply in principle.

### Some Background Information for Commercial Cryptography Product Certification Catalogue in China

The **Commercial Cryptography Product Certification Catalogue** is a regulatory list jointly maintained by SAMR and OSCCA. It defines specific categories of commercial cryptographic products that are subject to mandatory testing and certification before they can be legally sold, used, or integrated into government or critical infrastructure systems.

These include hardware, software, and systems providing encryption, decryption, digital signatures, authentication, and key management functionalities. They are intended to protect public, commercial, and personal data, excluding state secrets. Common products include secure communication modules, encryption chips, digital certificate systems, and key management platforms.

According to **Article 26, 27 and 36 of China's Cryptography Law**, commercial cryptographic products listed in the certification catalogue must undergo certification when:

- Procured by government agencies.
- Deployed in **critical information infrastructure** (e.g., finance, energy, telecom);
- Incorporated into systems covered by **national Multi-Level Protection Scheme (MLPS)**;
- Required by the cryptography administration for security assurance.



The intention of certification ensures that cryptographic products meet security, performance, and interoperability standards, enhancing trust and security in sensitive applications.

In current practice, in China, **Commercial Cryptography Product Certification** is The National Voluntary Certification (国推自愿认证), and the authority hopes the certification should be compulsory for the above-mentioned scenarios. The whole certification system has many indigenous requirements and de facto difficult for the products made by non-indigenous companies. However, whether the products actually need to make such certification- even if they are in the **Commercial Cryptography Product Certification Catalogue** – depends on the requests from users of the cryptography products.

[Note: The National Voluntary Certification (国推自愿认证) refers to a government-promoted voluntary conformity assessment scheme in China, implemented to guide quality improvement and support regulatory alignment.]

Different sectors in China now have different implementations for this subject. For example, all the financial organizations like banks need their products with **Commercial Cryptography Product Certificates**, more and more are required for automotives Industries, while other sectors still have not asked for the certifications yet.

China has released three batches of the catalogue to this date:

- **First Batch (2020):** Included 22 foundational product categories, such as cryptographic modules, secure keyboards, VPN devices, and digital signature servers.
- **Second Batch (2022):** Added 6 emerging categories including trusted modules, cloud cryptography, random number generators, and blockchain components.
- **Third Batch (2025):** Introduced identity-based encryption systems, industrial controller modules, and SSH/DTLCP security devices.

The catalogue is supported by:

- **Cryptography Law of the People’s Republic of China**
- **Implementation Opinions on Commercial Cryptography Testing and Certification**

For full lists and updates, refer to official notices published by **SAMR** and **OSCCA**.

Source: [https://www.cnca.gov.cn/zwx/gg/2025/art/2025/art\\_0a8339a89720456aad6d2742630d7db6.html](https://www.cnca.gov.cn/zwx/gg/2025/art/2025/art_0a8339a89720456aad6d2742630d7db6.html)

## 25. Brazil Takes Over Chairmanship of the BRICS Standardization Bodies Leaders' Meeting

# Belt-and-Road-Initiative

On April 11, 2025, meetings was held virtually with leaders and delegations from the Brazilian Association of Technical Standards (ABNT), Bureau of Indian Standards (BIS), South African Bureau of Standards (SABS), State Administration for Market Regulation / Standardization Administration of China (SAMR/SAC), Ministry of Industry and Advanced Technology of the United Arab Emirates (MoIAT), Institute of Standards and Industrial Research of Iran (INSO), and the Ethiopian Standards Agency (ESA) participated in the first 2025 meeting of BRICS standardization bodies. Representatives from the National Standardization Agency of Indonesia (BSN) attended the meeting for the first time as observers. The Russian delegation was led by Anton Shalaev, Head of the Federal Agency on Technical Regulating and Metrology (ROSSTANDART).

The meeting was chaired by ABNT, which assumed the 2025 BRICS rotating presidency from ROSSTANDART. Notably, during Russia's presidency in the previous year, significant progress was made in the fields of standardization and metrology. According to ROSSTANDART's 2024 Action Plan adopted at the beginning of the year, nearly ten international events were organized, including the landmark first-ever meeting of the heads of BRICS standardization

bodies. That historic meeting focused on exploring areas of cooperation and discussing prospects for collaboration among standardization agencies against the backdrop of deepening technical, industrial, and economic cooperation among member states—laying the groundwork for a collaborative framework in standardization.

At this first meeting in 2025, participants reviewed the draft **Memorandum of Understanding on Standardization Cooperation**. The draft focuses on promoting the exchange of best practices in standardization among BRICS members, enhancing coordination within international standardization organizations, and supporting joint international standard development initiatives. Furthermore, the MoU aims to create more opportunities for BRICS countries to expand cooperation in standardization by facilitating shared proposals and initiatives for joint projects in priority areas—such as conferences, workshops, and collaborative research.

Source: [https://www.cnis.ac.cn/gjbzh/gjdt/202504/t20250416\\_59832.html](https://www.cnis.ac.cn/gjbzh/gjdt/202504/t20250416_59832.html)

## 26. China's Expert Re-elected as Chair of APEC Expert Group on Energy Efficiency and Conservation

# Belt-and-Road-Initiative

On April 22, 2025, the Secretariat of the APEC Expert Group on Energy Efficiency and Conservation (EGEEC) officially announced that Liu Meng, Associate Researcher at the Resources and Environment Branch of the China National Institute of Standardization (CNIS), has been successfully re-elected as Chair of EGEEC. His new term will run from July 2025 to June 2027.

The APEC Expert Group on Energy Efficiency and Conservation (EGEEC) was established in 1993 and operates under the APEC Energy Working Group (EWG). It is responsible for cooperation on energy efficiency and conservation, with experts nominated by APEC member economies. The group regularly facilitates the exchange of policies, standards, and programs on energy efficiency and conservation across APEC economies and provides technical advice to the EWG in this field. EGEEC has a Chair and Vice-Chair who led the group's research and technical exchange activities and report regularly to the EWG. Each term lasts for two years.

With the approval of the National Energy Administration, CNIS serves as the Chinese counterpart organization for EGEEC and the lead unit of the "China Participation in the APEC Energy Cooperation Network – Energy Efficiency and Conservation Group." It represents China in EGEEC activities and leads APEC cooperation projects in energy conservation and low-carbon development. Since 2015, CNIS experts have held the positions of Chair and Vice-Chair

of EGEEC, playing a vital role in the group's standardization and sustainable development, and earning high recognition from experts of other member economies.

From April 8 to April 11, 2025, the 64th EGEEC meeting was held in Hong Kong, China, during which the election of the new Chair and Vice-Chair was conducted. Through on-site voting and written confirmation, all 21 APEC economies unanimously agreed to elect Liu Meng, nominated by China's National Energy Administration, as the new Chair of EGEEC.

Looking ahead, under the guidance of relevant authorities, CNIS will continue to enhance its participation in APEC's technical activities in energy efficiency and conservation, support regional cooperation on energy-saving and low-carbon technologies, standards, and policies, and share China's experience in energy conservation and carbon reduction. These efforts aim to contribute Chinese expertise toward APEC's regional goal of reducing energy intensity by 45% by 2035 compared to 2005 levels.

Source: [https://www.cnis.ac.cn/ynbm/zhfy/zhxw/202504/t20250425\\_59909.html](https://www.cnis.ac.cn/ynbm/zhfy/zhxw/202504/t20250425_59909.html)

***Annex 1 - SESEC V Report - China's Cybersecurity Review System***

***Annex 2 - SESEC V Translation - Administrative Measures for the Adoption of the International Standards***

***Annex 3 - SESEC V Translation - Understand Administrative Measures for the Adoption of the International Standards***

## Introduction of SESEC Project



The Seconded European Standardisation Expert in China (SESEC) is a visibility project co-financed by the European Commission (EC), the European Free Trade Association (EFTA) secretariat and the three European Standardisation Organizations (CEN, CENELEC and ETSI). Since 2006, there has been four SESEC projects in China, SESEC I (2006-2009), SESEC II (2009- 2012), SESEC III (2014-2017), SESEC IV (2018- 2022) and SESEC V (2022-2025). Dr. Betty XU is nominated as the SESEC expert and will spend the next 36 months on promoting EU-China standardisation information exchange and EU-China standardisation cooperation.

The SESEC project supports the strategic objectives of the European Union, EFTA and the European Standardisation Organizations (ESOs). The purpose of SESEC project is to:

- Promote European and international standards in China;

- Improve contacts with different levels of the Chinese administration, industry and standardisation bodies;
- Improve the visibility and understanding of the European Standardisation System (ESS) in China;
- Gather regulatory and standardisation intelligence.

The following areas have been identified as sectorial project priorities by the SESEC project partners: Internet of Things (IoT) & Machine-to-Machine(M2M) communication, communication networks & services, cybersecurity & digital identity, Smart Cities (including transport, power grids & metering), electrical & electronic products, general product safety, medical devices, cosmetics, energy management & environmental protection (including eco-design & labeling, as well as environmental performance of buildings).

### SESEC V China Standardisation and Technical Regulation Bimonthly Newsletter

SESEC V China Standardisation and Technical Regulation Bimonthly Newsletter is the gathering of China regulatory and standardisation intelligence. Most information of the Monthly Newsletter was summarized from China news media or websites. Some of them were the first-hand information from TC meetings, forums/workshops, or meetings/dialogues with China government authorities in certain areas.

### In this Bimonthly Newsletter

In this Bimonthly Newsletter, some news articles were abstracted from Chinese government organizations. All new published standards, implementation or management regulations and notice are summarized; original document and English version are available.

## Abbreviations

<b>SAMR</b>	State Administration for Market Regulation	国家市场监督管理总局
<b>CAS</b>	China Association	中国标准化协会
<b>CCC</b>	China Compulsory Certification	中国强制认证
<b>CCSA</b>	China Communication Standardization Association	中国通信标准化协会
<b>CEC</b>	China Electricity Council	中国电力企业联合会
<b>CEEIA</b>	China Electrical Equipment Industrial Association	中国电器工业协会
<b>CELC</b>	China Energy Labeling Center	中国能效标识中心
<b>CESI</b>	China Electronic Standardization Institute	中国电子标准化研究所
<b>CMDSA</b>	Center for Medical Device Standardization Administration	医疗器械标准管理中心
<b>CNCA</b>	Certification and Accreditation Administration of China	中国国家认证认可监督管理委员会
<b>CNIS</b>	China National Institute of Standardization	中国国家标准化研究院
<b>CNREC</b>	China National Renewable Energy Center	中国国家可再生能源中心
<b>EPPEI</b>	Electric Power Planning and Engineering Institute	电力规划设计总院
<b>IEC</b>	International Electrotechnical Commission	国际电工委员会
<b>ITEI</b>	Instrumentation Technology and Economy Institute	机械工业仪器仪表综合技术与经济研究所
<b>MEE</b>	Ministry of Ecology and Environment	中国生态环境部
<b>MIIT</b>	Ministry of Industry and Information Technology of People's Republic of China	中国工业和信息化部
<b>MoH</b>	Ministry of Health	卫生部
<b>MoHURD</b>	Ministry of Housing and Urban-Rural Development	住房与建设部
<b>MOT</b>	Ministry of Transport	中国交通运输部
<b>MOST</b>	Ministry of Science and Technology	中国科学技术部
<b>NDRC</b>	National development and reform commission People's Republic of China	中国国家发改委
<b>NIFDC</b>	National Institute of Food and Drug Control	中国食品药品检定研究院
<b>SAC</b>	Standardization Administration of China	国家标准化管理委员会
<b>SGCC</b>	State Grid Corporation of China	国家电网
<b>TC</b>	Technical Committee for Standard Development	标准化技术委员会