



China's CCC Mark

Navigating the System



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China Standards Overview

- Safety Mark -- CCC Mark (20% of U.S. exports)
 - > Must meet individual standards to comply
 - > Must undergo testing and factory inspection
- Mandatory Standards -- 2700
 - > Utilized in the CCC Mark registration process
 - > Also enforced independently of CCC - at border
 - > Also enforced in after-market surveillance
- Other Regulatory Requirements
 - > SFDA, MII, MOH, SEPA, etc.
 - > Sometimes redundant of CCC, but still required
 - > Don't assume CCC is all you need; do your research

China's Previous Systems

- CCIB Mark
 - > Safety license mark, first put in place in 1989, with 9 product categories, expanded to 47 product categories in 1996/1997
- "Great Wall" or CCEE Mark
 - > Electrical safety license mark, put in place in late 1990s, with seven product categories



Creation of CCC Mark

- Prior two-mark system
 - Redundant, burdensome, and not WTO compliant
 - Some imports needed both marks; Some domestic products required less burdensome or no licensing
- WTO Rules
 - For all mandatory standards and testing rules, a country must ensure:
 - National Treatment - domestic products and imports must be treated the same
 - Transparency - publication and availability of laws, regulations, and mandatory standards

The Good News

- Transparency now required by WTO
 - Detailed technical regulations are public
 - The public can comment on new rules
 - A WTO National Enquiry Point fields enquiries
- A level playing field with domestic goods
- Redundancies have been reduced
 - Some still exist, e.g. medical devices and IT/telecom
- Trade barriers can now be addressed at WTO
- WTO pushes China toward internationalization of standards and testing

The Bad News

- Burdensome rules still exist
 - In-country testing; factory inspections
- Redundancies remain
- Chinese Regulatory Practices
 - Vague regulations
 - Reliance on dialogue between testers or regulators and applicants, instead of specific written rules
 - Local regulators or customs officials have great autonomy

Start of the Road

- First Steps
 - Determine if you need the mark
 - Determine if you will apply, or seek outside help
- Costs: \$5000 to \$15,000+
- Timeframe: 60 to 90 Days, up to six months
- Application Process
 - Application
 - Type Testing
 - Factory Inspection
 - Evaluation
 - CCC Certification and Marking
 - Follow-up Inspections

How to Apply

- A challenging application process
 - Relative lack of procedural guidance
 - A new system
 - Language barriers
 - Importance of personal contacts
- Consultants
 - Cost more, but often worth it
 - Access to more resources, knowledge of rules, experience, and a presence or partners in China
 - Find out how experienced they are with CHINA!
 - Get references from satisfied China exporters

How to Apply (continued)

- Your Company
 - Sometimes less costly than consultants
 - Consider this route if your company has experience with meeting other countries' regulatory/safety licensing systems. China shouldn't be your company's first introduction to safety marks!
- Your Partners
 - Freight forwarders, distributors, or your Chinese partners may be able to handle CCC registration or find trusted contractors

Breaking News

- Factory Inspection Policies
 - Interim Policy, announced June 10
 - Effective "during SARS period," CCC applications can proceed and a CCC registration can be issued, before factory inspection takes place, at the applicant's request, if certain requirements are met
- CCC Extension to August 1, 2003

Spare Parts & Components

- "Do my component parts need CCC?"
 - If you are shipping finished units, individual components *do not* require separate CCC marking
 - If you later ship replacement parts, special rules apply
- "My Product is on the CCC Mark List. When can I be exempt?"
 - Shipping to China for assembly and re-export? You can apply for an exemption
 - Shipping *specific* replacement parts? You can apply for an exemption
 - Other exemptions exist. See China's "Announcement 8" for exemption details

Necessary Documents

- The Product Catalogue
 - <http://www.cqc.com.cn/cc/catalogueeng.pdf>
- Implementing Regulations
 - <http://www.cnca.gov.cn/download/english.html>
- GB Standards - 2700
 - China's WTO TBT Enquiry Point, TBT@AQSTO.GOV.CN
- CNCA "Announcement 60," HS codes guidance
 - <http://www.cnca.gov.cn/board/bianmabiao.htm>
- CNCA "Publication 8," Guidance on Exemptions
 - <http://www.mac.doc.gov/china/docs/businessguides/cccannouncement8.htm>

The Future

- Product List -- Expect additions/subtractions
- Mutual Recognition -- increased cooperation between Chinese and foreign regulators
 - Factory inspections, or follow-up inspections, to be conducted by home country organizations
 - Product tests conducted by home country testers
- Self-Certification - Not likely
- Reduction of testing/certification redundancies

US Government Action

- Close dialogue with Chinese government
 - Regular contact in Washington, Beijing, Shanghai, and Geneva
 - PRC has asked US Embassy for input
- Close dialogue with industry
 - Arranging meetings with Chinese government
 - Participating in industry/PRC consultations
- Objectives of US Government
 - Facilitate US exports with information and troubleshooting
 - Ensure China's policies are consistent with WTO rules
- Outreach
 - Programs like this one; webguides; publications; responding to inquiries.

US Government Resources

- In the U.S. - U.S. Department of Commerce
 - China Desk
 - Trade Information Center
 - Trade Compliance Center
 - Local Export Assistance Centers
- In China
 - Commercial Service offices in Beijing, Shanghai, Guangzhou, Chengdu, Shenyang, and Hong Kong
 - Can answer your questions
 - In-depth business services at low cost: research, market analysis, meetings with PRC government and partners
 - Help you find Chinese partners, distributors, sales reps, etc.

Chinese Government Resources

- TBT Enquiry Point
 - Can provide you information on Chinese standards requirements, as well as actual text of standards (usually in Chinese)
 - Telephone: 0086-10-856-22885
 - Facsimile: 0086-10-856-22884
 - E-Mail: TBT@AQSIQ.GOV.CN
- CNCA Sector Offices and CQC
 - On-line application process
 - Can field questions via fax or meetings

Help Us Help You

- We need your feedback:
 - How long and costly was the process? How did it compare to other countries? What problems did you encounter? Did you have to use a consultant?
- Your feedback helps us help you, and determine whether problems are systemic, or transitional, or isolated glitches
 - Technical glitches? We'll work with China to fix them, and strengthen the system
 - Trade Barriers? With China as a WTO member, it is bound by international law and we now have a forum for addressing trade barriers

Contact Us:

- US Commerce Department can help you
 - China Desk
 - Timothy_Wineland@ita.dcc.gov 202-482-5316
 - www.export.gov/china
 - www.mac.dcc.gov/China/Docs/BusinessGuides/rmgguide.htm
 - Your Local US Export Assistance Center
 - www.hxyusa.gov
 - Trade Information Center
 - www.export.gov/tic
 - US Foreign Commercial Service - Beijing
 - www.hxyusa.gov/china/en
