



# China Market Access for Consumer Goods

**2025 REPORT**

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## EXECUTIVE SUMMARY

For newcomers, the Chinese market of consumer goods might look too complex and overwhelming, considering the **numerous – and often overlapping – product safety standards and conformity assessment requirements that must be met** to enter the market. This may discourage EU SMEs to explore the opportunities offered by many consumer market segments. This report aims to address this issue, specifically:

1. The first section looks into the definitions of consumer goods, the structure of the market, as well as the available market entry channels. Consumer goods imported in China via Cross-Border E-Commerce are often exempted from many requirements,<sup>1</sup> particularly in terms of labelling or mandatory certification, therefore the focus of this report will be on products imported via general trade.
2. The second section focuses on the core elements of China's product safety system, including its legal framework, the competent authorities involved, and especially the country's **complex system of mandatory and voluntary standards and certification schemes**. The issue of how compliance is demonstrated and inspected by relevant Chinese actors before products are placed on the Chinese market will also be covered: significant differences exist with the EU framework, and compliance with the EU framework does not automatically correspond to compliance in China.
3. The third and fourth sections provide **detailed examples of China's certification schemes**, respectively: (i) the most common horizontal schemes, which apply to certain features or products across various industries, such as CCC, the

China Energy Efficiency Label, and China RoHS II; (ii) vertical schemes which apply to specific product categories or subcategories only, for instance telecommunication equipment and cosmetics.

A specific **case study for textile and apparel products** concludes this report. It provides an example of how different typologies of products must comply with a complex system of standards involving various aspects, such as health, safety and labelling requirements. The aim is to guide EU manufacturers, not only in the textile and apparel sector, to understand and navigate through the different layers of compliance requirements for their products before they can be sold in China.

In short, China's standards and certification requirements are complicated and time-consuming – but **perfectly manageable with solid planning, resources and support** from partners on the ground.

## SEND US YOUR QUESTIONS



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<sup>1</sup> For more information on China's CBEC, including its advantages and disadvantages, see the FAQs on the EU SME Centre's website: <https://www.eusmecentre.org.cn/faq>, our report **Selling to China via Cross-Border E-Commerce** (2023): <https://www.eusmecentre.org.cn/publications/selling-to-china-via-cross-border-e-commerce/>, our webinar recordings **How to Sell to China via Cross-Border E-Commerce** (2023): <https://www.eusmecentre.org.cn/publications/how-to-sell-to-china-via-cross-border-e-commerce/> and **How to Export to China via E-Commerce** (2024): <https://www.eusmecentre.org.cn/publications/how-to-export-to-china-via-e-commerce/>.

## 1. SECTOR OVERVIEW

Product compliance in China and the assurance of product safety and consumer protection depend on the scope of application. The definition of consumer goods is not consistent and coherent for the Chinese market; but Chinese standards indicate a general understanding.

Specifically, the standard *GB/T 35248-2017 Consumer Good Safety* describes consumer goods as “*designed and produced primarily for – but not limited to – personal use, including its components, parts, accessories, instructions, and packaging*”. This definition is **coherent with international ISO standards**. Other provisions further define consumer goods as products that need to be purchased and used by consumers for living consumption. According to *GB/T 36431-2018 Classification and Code of Consumer Goods*, consumer goods are divided into eleven categories, based on the specific requirements of the products and the use of raw materials; several subcategories also exist.<sup>2</sup>

Categories of consumer goods
Culture, education and sports goods 文教体育用品
Household appliances and electrical accessories 家用电器及电器附件
Electronic and IT products 电子及信息技术产品
Children products 儿童用品
Furniture, decorating and refurbishing materials 家具及建筑装饰装修材料
Apparel and household textiles 服装鞋帽及用纺织品
Household chemicals and hygiene products 日用化学制品及卫生用品
Non-motor vehicles 交通用具及相关产品
Food-related products 食品相关产品
Other daily necessities 日用杂品
Other consumer goods 其他消费品

For each category and subcategory, general regulations for consumer goods apply. At the same time, additional sector-specific requirements, and/ or other horizontal schemes needs to be considered.

### 1.1 GENERAL ASPECTS TO CONSIDER

Product compliance in China involves a combination of market access licenses, compulsory and voluntary standards, as well as assumptions and expectations of Chinese consumers. Compliance with the regulatory framework confirms the safety of the product, and therefore ensures the health and rights of consumers. Meeting these complex requirements commands expertise and time. The following general aspects must be taken into account:

- **Rapidly changing framework:** China’s regulatory framework is characterised by both vertical, sector-specific regulations, as well as horizontal, cross-cutting ones. Both are constantly evolving, often without pre-announcement or allowing short transition periods; information is often fragmented and rarely available in English.
- **Mandatory market access schemes:** The majority of all consumer goods require some kind of license, certification or product registration, before they can be imported or placed in the Chinese market. These may be linked to lengthy and costly conformity assessment processes, impacting both the timing and eventual cost of these products.
- **Not entirely a single market:** The Chinese market is, in general, a relatively unified market. However, there exist some instances of local protectionism reflected in local standards; most importantly, authorities and customs officials in different locations may have different interpretations of compliance requirements and procedures.
- **Language:** All instructions, displays, manuals and other documents must be provided in Chinese. This is both a legal requirement and an expectation of Chinese consumers. Some exceptions apply for certain products allowed to be sold via Cross-Border E-Commerce (more details in section 1.2).

<sup>2</sup> The full list of subcategories can be found, in Chinese, at: <https://openstd.samr.gov.cn/bzgk/gb/newGbInfo?hcno=87752938AC4485EE-AE00A156787140CD> (accessed: 12 Nov 2025). For instance, within the ‘apparel and household textile’, there are seven subcategories: (i) bedding fabrics; (ii) daily fabric products; (iii) clothing; (iv) shoes; (v) hats and accessories; (vi) dresses; (vii) others. In turn, each subcategory contains dozens of specific products.

- **Localisation:** Depending on the type of product and target audience, it is often necessary to tailor consumer goods to the Chinese market and adjust them to the needs and preferences of Chinese consumers, especially – but not only – in terms of packaging and design. This trend has been growing exponentially in recent years, particularly within the clothing and fashion sectors.
- **Intellectual property (IP) protection:** A proper strategy for the protection of all IP rights (trade-marks, design, etc.) is a must before even

considering entry into the Chinese market.<sup>3</sup>

- **Customs:** The frequency of inspections by Chinese customs is generally higher than in most other countries. An important function of customs checks is to examine product licenses and certifications demonstrating compliance with regulations and standards.

More information on the above points will be provided in the next sections of this report.

## 1.2 MARKET ENTRY CHANNELS

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There are two main approaches to enter the Chinese market: **general trade**, and **Cross-Border E-Commerce (CBEC)**.

General trade is the traditional way to export products to China. This can be done (i) by working with Chinese importers, buyers, distributors, retailers, etc., which sell the products on the Chinese market without necessarily requiring the EU company to be physically present on the ground; (ii) by direct sales of the EU company actively present in the country; (iii) or a combination of both. In any case, the procedures to export products through general trade are long – usually requiring the product to go through a lengthy registration, testing and certification process with the supervising department in China, as well as **large upfront investments**. The main advantage of general trade is that products can be exported without any limit on quantity, and therefore can be sold on both physical stores as well as traditional e-commerce platforms – either directly by the company or through its local distributors or third-party agencies.

On the other hand, CBEC involves the online sale of products across borders and through dedicated platforms. Such products are either directly shipped from Europe after an online order has been made by the Chinese consumer, or are preliminarily stored in a bonded warehouse in China and sent to the Chinese consumer once the online order is placed. CBEC products are considered personal goods and granted customs clearance without the need for pre-registration or certification otherwise required for general trade. The main advantage of CBEC thus is that it provides **easier access to the Chinese market for EU brands**.

However, those products need to be included in a specific CBEC Catalogue (many consumer goods are included, mainly F&B, cosmetics, apparel, toys, household and cleaning products, daily necessities), can only be sold online and customers can only spend up to 26000 CNY/year/person (around 3200 EUR/year/person). Still, CBEC may constitute an effective way to first test the product in the Chinese market before making more costly investment decisions.

Because products sold via CBEC are generally exempted from mandatory market access schemes, this report focuses on compliance requirements for products sold via general trade. More information on CBEC, including reports, guidelines, training recordings and FAQs, can be found on the website of the EU SME Centre.

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<sup>3</sup> For free technical assistance on IP-related issues in China, EU SMEs may refer to the EU-funded project China IP SME Helpdesk: [https://intellectual-property-helpdesk.ec.europa.eu/regional-helpdesks/china-ipr-sme-helpdesk\\_en](https://intellectual-property-helpdesk.ec.europa.eu/regional-helpdesks/china-ipr-sme-helpdesk_en).

## 2. PRODUCT SAFETY AND CONFORMITY ASSESSMENT: CORE ELEMENTS

### 2.1 REGULATORY FRAMEWORK

The general legislation regarding product safety and liabilities in China is the *Product Quality Law* – first issued in 1993 and revised in 2018;<sup>4</sup> a new revision is expected in the coming years. The law aims at strengthening the supervision and inspection of product quality, thus ensuring the health and safety of consumers. It applies to consumer goods that are processed or manufactured for the purpose of sale within China – including construction materials but excluding construction projects. Producers, manufacturers, and distributors are required to provide information regarding product quality, as well as to repair or refund the product if it does not meet the required standards or the quality conditions indicated. In general, the key elements of China's *Product Quality Law* are similar to the EU's *General Product Safety Directive* – though some differences exist. The law stipulates that **products imported into China** must:

- Not constitute any unreasonable threat to personal safety or safety of property;
- Conform to existing standards for human health, personal safety, or property safety;
- Possess the properties as required by law, unless stated as being defective;
- Conform to the standards indicated on the products themselves.

The **certification marks** displayed on the products must:

- Be authentic;
- Be accompanied by certificates showing that the product has passed inspection;
- Include both the name of the product and the name and address of the producer in China;
- Contain all necessary information regarding the specification and grade of the product and its ingredients, including indications on the packaging where appropriate;
- Include the production date and expiration date where applicable;
- Come with a warning in instances where improper use may cause damage to the product or endanger personal safety or property.

In addition to the general *Product Quality Law*, European SMEs also need to follow **sector-specific laws, regulations and departmental rules** that regulate the safety of products in the Chinese market. Examples are the *Agriculture Product Quality and Safety Law* together with the *Food Safety Law* for F&B products; the *Cosmetics Supervision and Administration Regulation* for cosmetics; etc. On top of these, Chinese technical standards and certification schemes will also need to be followed (more details in sections 2.3 and 2.4).

### 2.2 COMPETENT AUTHORITIES

The primary authority to enforce product safety regulations and to supervise product quality is the **State Administration for Market Regulation (SAMR)**, in particular through its Department for Product Quality and Safety Supervision and Regulation. It is responsible for formulating and implementing catalogue-based management for certain product categories, conducting spot checks, risk monitoring, and classified supervision and management of product quality, as well as for coordinating sectoral, local and other professional supervision of product quality. SAMR also

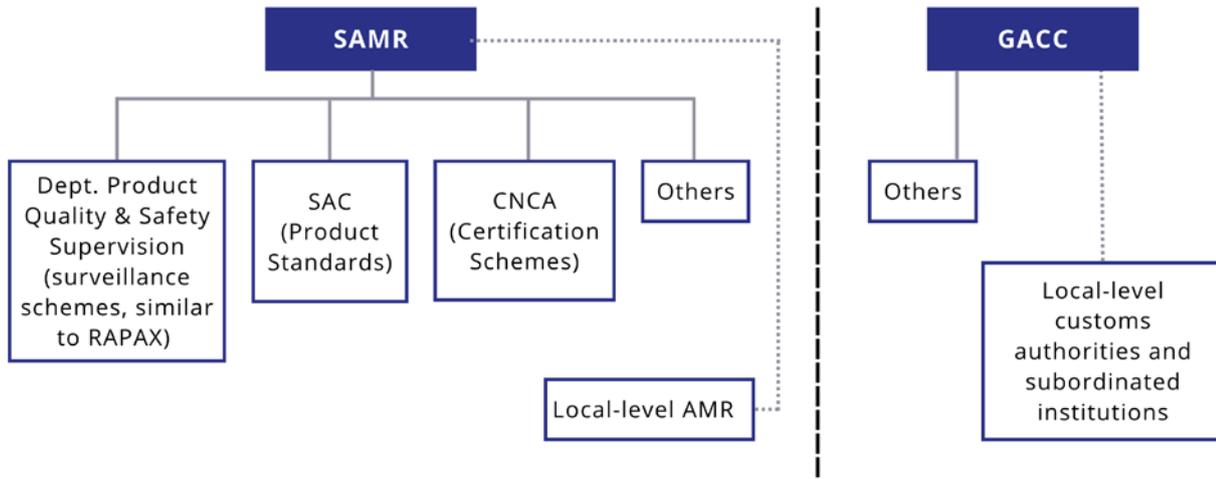
supervises, in turn, several other organisations, such as the **Standardisation Administration of China (SAC)**, which mainly manages, supervises and coordinates standardisation work in China, reflected in standards as well as standardisation policies and administrative rules; as well as the **Certification and Accreditation Administration of China (CNCA)**, which mainly manages, supervises and coordinates certification and accreditation activities in China, including implementation of policies and administrative rules for conformity assessment.

<sup>4</sup> An unofficial translation of the law in English is available at: [https://www.industry.gov.au/sites/default/files/adc/public-record/sgq\\_exhibit\\_b2.1\\_-\\_product\\_quality\\_law.pdf](https://www.industry.gov.au/sites/default/files/adc/public-record/sgq_exhibit_b2.1_-_product_quality_law.pdf) (accessed: 12 Nov 2025).

### Competent authorities for product safety regulations

All goods

Import-export goods only



Source: EU SME Centre

In addition, the **General Administration of Customs of China** (GACC) is the key agency responsible for conducting the customs inspection, performing safety checks at the port of entry, inspecting imported and exported consumer goods, and supervising other agencies responsible for similar inspections and checks. GACC thus plays a key role in the supervision and enforcement of the quality and safety of products traded internationally.

Finally, several other designated bodies are responsible for conducting testing, inspection and certification for specific types of products. A list of these bodies can be found, in Chinese, on SAMR's database.<sup>5</sup>

## 2.3 STANDARDS AND SPECIFICATIONS

Regulations, **standards and specifications** outline technical requirements to ensure the safety of consumer goods and, therefore, play a key role in addressing and ensuring compliance. China's standardisation system is relatively complex: standards are divided into government-led and market-driven, as well as **mandatory and voluntary standards** – with the former playing the greater role. In theory, manufacturers only need to follow mandatory standards, regardless of whether national or sectoral; in practice, however, there may be instances of voluntary standards (national, sectoral or association standards) being used as the basis of compulsory conformity assessment procedures, thus becoming *de facto* mandatory.<sup>6</sup>

Government-led	
Mandatory National Standards 强制性国家标准	Address technical requirements ensuring people's health and safety, as well as national and environmental safety and security
Voluntary National Standards 推荐性国家标准	Addressing specific technical requirements to serve basic and generic purposes. Compliance is not mandatory but strongly recommended
Sector Standards 行业标准	Developed to act as national unified standards within a specific sector, in the absence of voluntary national standards
Local Standards 地方标准	Developed to meet local conditions and needs within specific provinces or regions
Market-driven	
Association Standards 团体标准	Developed by social organisations to meet the market and innovation needs, and implemented voluntarily by members of those organisations and/or others
Enterprise Standards 企业标准	Developed by individual or groups of enterprises for their own use, often setting the benchmark for the industry

To identify the relevant standards, a special coding system was implemented with the *Standardization Law (2018)*. Mandatory national standards start with the two letters 'GB' and are followed by nine numbers that correspond to their specific code plus the year of publishing; voluntary standards are in addition to the two letters marked with the suffix 'T', while technical

<sup>5</sup> <http://cx.cnca.cn/CertECloud/index/index/page?currentPosition> (accessed: 12 Nov 2025).

<sup>6</sup> For an overview of the impact of de facto mandatory standards, see a report published in 2021 by the European Union Chamber of Commerce in China: <https://www.eurochamber.com.cn/en/publications-standardisation-report> (accessed: 12 Nov 2025).

guidance documents with 'Z'. For sectorial, local or enterprise standards, a specific prefix is established, e.g. 'FZ' for textiles, 'SJ' for electronics, etc.

GB XXXXX-YYYY = Mandatory National Standard  
 GB/T XXXXX-YYYY = Voluntary National Standard  
 GB/Z XXXXX-YYYY = Technical Guidance National Standard  
 FZ XXXXX-YYYY = Mandatory Sectoral Standard (Textile)  
 FZ/T XXXXX-YYYY = Voluntary Sectoral Standard (Textile)

Regarding consumer goods, currently, there are **more than 50 general national voluntary standards** in place (more than half of which were developed by the Consumer Goods Safety Technical Committee, TC508), covering aspects such as hazard risk assessment, labelling and instructions manuals, etc. There are also several mandatory or voluntary standards for specific products implemented, such as *GB 18401-2010 National General Safety Technical Code for Textile Products*, or *GB/T 5296.4-2012 Instructions for the use of products of consumer interest — Part 4: Textiles and apparel*. Chinese standards might occasionally correspond to (or be aligned with) international standards, such as *GB/T 35249-2017 / ISO 10377:2013 Consumer Goods Safety – Guidelines for Suppliers*. More details on the coding system for specific sectors, as well as on consumer goods standards, can be found in a training organised by the EU SME Centre on the topic in May 2022.<sup>7</sup>

## 2.4 CERTIFICATION, MARKS AND LICENSING SYSTEMS

Regardless of whether a product is imported or produced domestically, it is often required to obtain specific certificates, marks or licenses in advance in order to be granted market access. **Certification, marks and licensing schemes in China are based on various technical standards.** These could be vertical, i.e. applying to specific sectors or products only; as well as horizontal, i.e. applying for certain features or characteristics of products found across many industries. Certificates, marks and licenses are generally **mandatory**: goods cannot be sold without obtaining them. There are, however, a number of certification schemes that are voluntary (e.g., China's Green Product Certification), yet they are strongly recommended as they often constitute the basis on which government incentives and subsidies are granted, or public procurement decisions made; and they are also a strong driver for marketing activities.

### How to identify Chinese standards?

Finding relevant Chinese standards for one product is not an easy task given the complexity of China's standardisation system – basic knowledge of Chinese language may be needed. The first step that EU SMEs shall do is to search standards through the **Europe-China Standardisation Information Platform** (<http://eu.standards-portal.cn/cnf/euen/>), which summarises all active Chinese standards in the following sectors and product groups: electrical appliances; environmental protection; aerosol containers; packaging; textile; toys; child care articles; leather; green products, eco-design and energy labelling; medical devices; machinery; railway-related products. The platform also offers sector-specific market entry guides.

Another resource available is China's **National Public Service Platform for Standards Information** (<https://std.samr.gov.cn/>) established by SAMR. The platform is only available in Chinese but users may try to search for keywords in English as each standard issued provides the translation of its name in English. The critical issue with Chinese standards is that their **full texts are not always publicly available**: generally, mandatory national standards and most voluntary national standards can be read online in Chinese language; only those that are identical or modified adopted from ISO/IEC standards, do not have the full texts available online. In any case, if available, full texts are accessible through the dedicated platform: <https://openstd.samr.gov.cn/bz/gk/gb/>.

It is even rarer that standards are officially translated in English. For this reason, EU SMEs are recommended to get in touch with the EU SME Centre to understand all the mandatory and voluntary standards applicable to their products.

The table on the next page summarises the most common certification, marks, and licensing schemes applying to consumer goods. In general, **electronic and energy-consuming products face the highest requirements, together with those products targeted for and used by children.** But it must be kept in mind that, even within a sector specific products or subcategories may be exempted from such certification, or nonetheless are subject to lighter procedures – such as in the case of low-voltage (<12 volts) electrical products. Similarly, other certification schemes not

<sup>7</sup> <https://www.eusmecentre.org.cn/event/2022-05-10/product-safety-and-conformity-assessment-consumer-goods-china>.

listed here may exist for very specific products or subcategories, for instance if a product is to be used for special operations. Hence, companies must examine in detail all the technical requirements applicable to their products and usage. Finally, relevant producers **will also need to comply with other relevant standards**, e.g. in terms of labelling, packaging, limits of hazardous substances, etc.

The core elements of certification and licensing schemes in China cover factory, production and quality management systems. The aim is to validate compliance with Chinese standards. This, in practice,

involves detailed technical documentation, as well as **testing and inspection** – although the specific type of testing required depends on the specific products, their components, usage, and/or other sector-specific requirements. A common requirement is that testing must be conducted in certain government-accredited laboratories and institutions; **results obtained from overseas laboratories are generally not recognised** by the Chinese authorities or certification bodies.<sup>8</sup>

For some specific schemes, factory inspection by Chinese evaluators is required.

	Vertical scheme	China Compulsory Certification (CCC)	China Energy Efficiency Label	China ROHS	Waste Electrical Electronic Equipment (WEEE)
Household appliances		✓	✓	✓	✓
Electronic and IT products	*	✓	✓	✓	✓
Children products	*	✓		✓	
Furniture and refurbishing		✓			
Apparel and textile					
Hygiene, chemicals, cosmetics	✓				
Non-motor vehicles		✓			
F&B products	*				

\* Only for specific products, e.g. telecommunication equipment; children's cosmetics; high-risk food products, etc.

## 2.5 INSPECTIONS, SURVEILLANCE AND RECALL OF PRODUCTS

### Customs inspections

All imported goods are subject to **customs inspection** when arriving at the port of entry in China. The first element inspected is the documentation required for customs declaration, including the assessment of the HS code for the calculation of corresponding import duties and taxes to be paid, as well as all relevant technical documents proving compliance with Chinese standards and conformity assessment schemes.

Depending on the product, as well as the records of its manufacturer, exporter, importer and distributor, Chinese customs authorities will apply **different**

**inspection procedures**, including physical inspection of products and their labels; visual inspection to identify visible anomalies; and/or functionality inspection to verify the integrity of documentation submitted. If potential problems are suspected, customs authorities may take samples to conduct further testing, which can substantially delay the inspection process.

If violations are confirmed, including with the technical documentation, labels, certification or marks, the products will not be cleared by the customs and either be returned to the origin or destroyed.

<sup>8</sup> It must be noted that several officially designated Chinese laboratories have, out of their own initiative, partnered up with other laboratories based in Europe, to conduct testing on their own behalf. This trend intensified during the COVID-19 pandemic.

On the other hand, if the inspection confirms the compliance of the product, the customs authorities will provide relevant customs clearance documentation and process the payment of duties and taxes for the release of the products.

## **Market surveillance**

To safeguard the safety and legitimate rights of consumers, SAMR implements **inspections and spot checks** of manufacturing and storage facilities in China, based on the procedures stipulated in the *Interim Measures for the Administration of Supervisory Spot Checks on Product Quality (2019)*.<sup>9</sup> Relevant officials will visit the manufacturing or storage facilities and perform tests using distinct methods relevant for the product. By regulation, products under the same trademark shall not be subject to spot checks twice or more within a six-month period.

Those facilities and products not matching the safety standards will face severe consequences, such as the immediate ban of the products sale, the public announcement of disqualification by the authorities, and in severe cases, the revoke of the business license and temporary closure of business operation until effective rectification measures are adopted.

## **Recall of products**

In 2020, SAMR issued the *Interim Provisions on the Recall of Consumer Goods*,<sup>10</sup> outlining several obligations and responsibilities for both producers and operators (e.g., sellers, leasers, repairers) to **recall non-compliant or defective consumer goods**. Goods are considered defective if an unreasonable danger affecting personal or property safety that generally exists within the same group, model or category of consumer goods due to design, manufacturing, warning and other reasons. If defects are confirmed, product manufacturers shall conduct investigations on those and **implement recall plans** – i.e., activities aimed at eliminating defects or reducing safety risks by supplementing or correcting warning signs, repair, replacement, return and other remedial measures. At the same time, they should stop the sale, production, or import of defective consumer

goods, and inform the competent authorities of the defect as well as the outcomes of the recall plan, in a timely manner. SAMR and its provincial-level branches will supervise and inform the public about the process. A dedicated platform has been established for this purpose: <http://www.recall.org.cn/>.

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9 An unofficial translation of the law in English is available at: <http://www.lawinfochina.com/display.aspx?id=31767&lib=law> (accessed: 12 Nov 2025).

10 An unofficial translation of the law in English is available at: <http://www.lawinfochina.com/display.aspx?lib=law&id=31762> (accessed: 12 Nov 2025).

### 3. HORIZONTAL CERTIFICATION SCHEMES: EXAMPLES

As there is often **no official mutual recognition** of compulsory product marks or testing results between Europe and China,<sup>11</sup> European companies cannot rely on the existing logos, labels or marks used in the EU or other markets: adaptation to the Chinese certification requirements and regulations is required – especially considering that these apply equally to both imported products and those manufactured domestically.

As indicated in section 2.4, there exist in China both horizontal and vertical certification, marks and licensing

schemes. This section focuses on the **most common horizontal schemes**, which apply to certain features or characteristics of products found across many industries.

Specifically, the China Compulsory Certification, the China Energy Efficiency Label, and the China ROHS II will be introduced. Other schemes exist, such as the Waste Electrical Electronic Equipment (WEEE) or the Green Product Certification which is increasingly been encouraged by the Chinese government but not yet widely applied.<sup>12</sup>

#### 3.1 CHINA COMPULSORY CERTIFICATE – CCC



The **China Compulsory Certification (CCC)** scheme was introduced in 2002 by CNCA. It applies to all products and systems – imported and domestically manufactured – that present

health, safety and environmental protection risks. All products listed on a **dedicated CCC Catalogue** must undergo strict inspection, testing and certification procedures before being allowed to be sold on the Chinese market.

The CCC Catalogue currently lists 109 items under 17 product categories, namely:

- (i) wires and cables;
- (ii) circuit switches and electrical devices for protection and connection;
- (iii) low-voltage apparatus;
- (iv) low power motors;
- (v) electrical tools;
- (vi) electric welders;
- (vii) equipment for household and similar uses;
- (viii) electronic products and safety accessories;
- (ix) lighting appliances;
- (x) motor vehicles and safety accessories;

- (xi) agricultural machinery;
- (xii) fire products;
- (xiii) building material products;
- (xiv) children products;
- (xv) explosion-proof materials;
- (xvi) household gas appliances;
- (xvii) electric vehicle conductive supply equipment.<sup>13</sup>

Products not listed in the Catalogue, or meeting very specific criteria for exemption (e.g. in case a product is to be imported for trade fairs or exhibitions, or for R&D, see Art. 41 and Art. 42 of the *Administrative Measures for Compulsory Product Certification*<sup>14</sup>) do not require CCC certification.

To obtain the CCC certification, there are currently **two different conformity assessment procedures** in place. The first step, therefore, is to identify within the CCC Catalogue the specific procedure applicable to the product, after ensuring that the product fully meets all the required technical standards.

- **Third-party certification:** for products with high safety risks and close contact with final consumers. See the standard process on the next page (Fig. 1).

<sup>11</sup> A few exceptions exist for the mutual recognition of test results between the EU and China, for instance, the IECEE CB-Certificate for electrical and electronic products. Depending on the licensing scheme, some of the protocols under this scheme are in fact admitted in China, most notably the CB-Certificates for electrical safety for low-voltage equipment under the CCC regulations. Yet, despite the applicability of the IECEE CB-Certificate, other certificates compulsory for certain product categories may still be mandatory.

<sup>12</sup> More information on green product certification is available in a training organised in 2021 by the EU SME Centre: <https://www.eusmecentre.org.cn/event/2021-05-11/china-eu-eco-design-standardization-%E2%80%93-similarities-and-differences>

<sup>13</sup> <https://www.eusmecentre.org.cn/faq/what-is-the-china-compulsory-certificate-ccc-does-my-product-need-it/>. EU SMEs may also contact the EU SME Centre through Ask-the-expert for assistance in determining whether their products are in the CCC Catalogue or not.

<sup>14</sup> [https://www.gov.cn/zhengce/2022-10/08/content\\_5723510.htm](https://www.gov.cn/zhengce/2022-10/08/content_5723510.htm) (accessed: 12 Nov 2025).

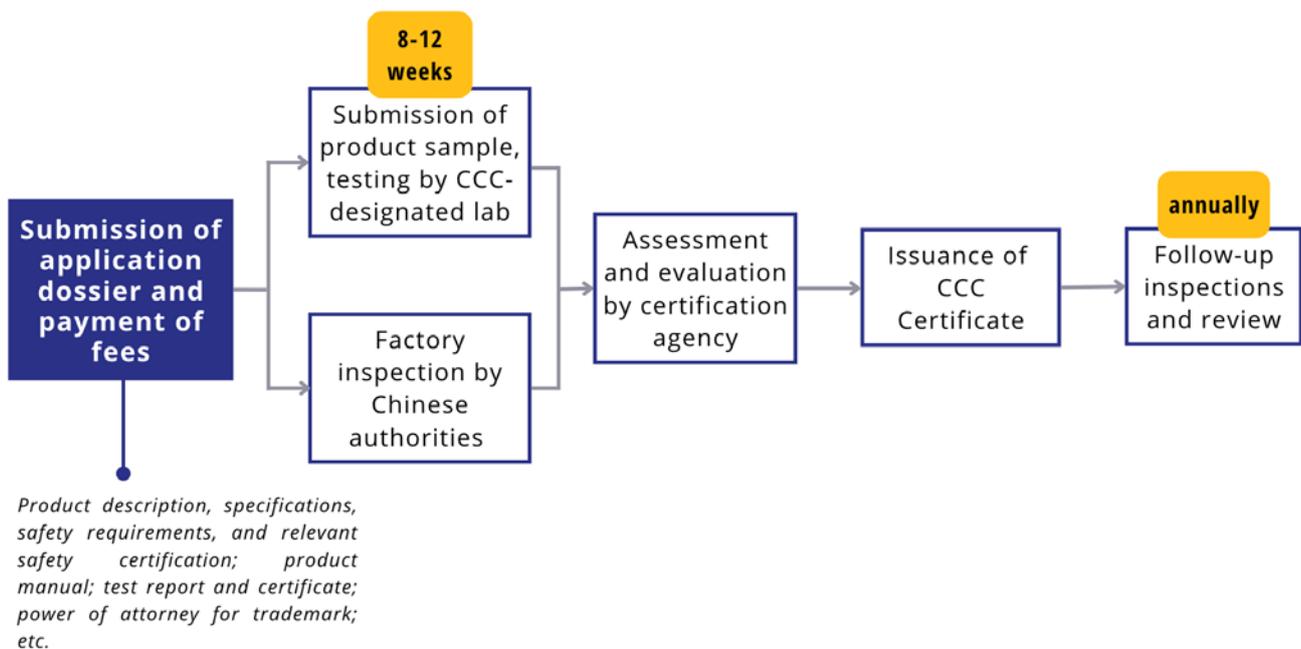
- **Self-declaration** (also referred to as Supplier Declaration of Conformity, SDoC): for products with stable quality and low safety risk. The self-declaration method is, in turn, further divided into **method A** (allowing type test to be done in any labs recognised by CNAS or members of ILAC + self-declaration), and **method B** (requiring type test to be done in specifically designated CCC labs + self-declaration). The standard process is illustrated on the next page (Fig. 2).

The main difference between the two methods thus relates to the stricter and longer procedure for third-party certification, which involves factory inspection

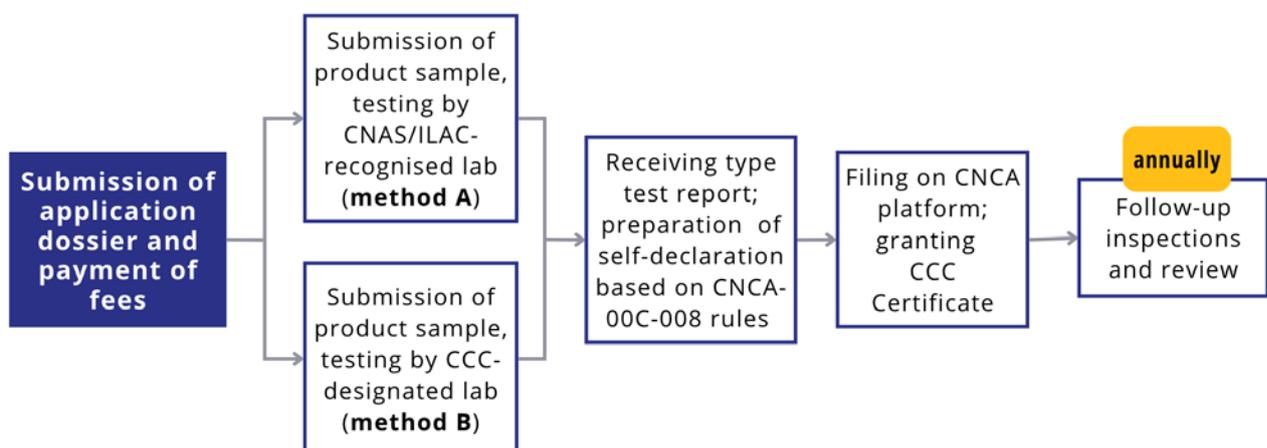
as well as technical evaluation by a certification agency; while self-declaration is mostly limited to laboratory testing (with method A granting ample choice of laboratories to be chosen) and a filing of the type test report and self-declaration through a dedicated CNCA platform.<sup>15</sup>

**The entire process for third-party certification may take several months.** Once the CCC certificate is obtained, the CCC mark must be attached to the product and can be affixed by laser, print, gravure, press or by a unique label. The CCC certificate is valid for 5 years, but annual auditing must be conducted to demonstrate continuous compliance with the relevant standards.

**Fig. 1: CCC Third-party certification for products with high safety risks**



**Fig. 2: CCC Self-declaration, or Supplier Declaration of Conformity, for low-risk products**



Source: EU SME Centre

<sup>15</sup> <http://sdoc.cnca.cn/mcsr/login> (accessed: 12 Nov 2025).

The **complete list of 292 CCC-designated labs** (third-party certification and self-declaration method B) and **35 CCC certification agencies** (third-party certification) is available on CNCA's website.<sup>16</sup> Among them, 6 labs are foreign-invested, while none of the certification agencies is. It is noteworthy that each certification body and laboratory may have specific fields of specialisation and thus may not accept applications for certain products out of their scope.

The **standard administrative fees** for obtaining the

CCC certification are relatively low and generally do not exceed RMB 30 000 – depending on the specific composition of the product, selection of models, variations in critical components, and use of spare parts and consumables. These factors affect the cost of the certification and can be significant, especially for small series or for spare parts.

The cost of a specialised consulting company hired to handle the certification process will also have to be factored in.

### 3.2 CHINA ENERGY EFFICIENCY LABEL – CEL



China has established a national-level harmonised system for energy efficiency of energy-consuming products. The main legal basis is the *Measures for the Administration of Energy Efficiency Labelling* (first issued in 2004, revised in 2016),<sup>17</sup> which in turn is grounded on the *Energy Conserving Law* and the *Product Quality*

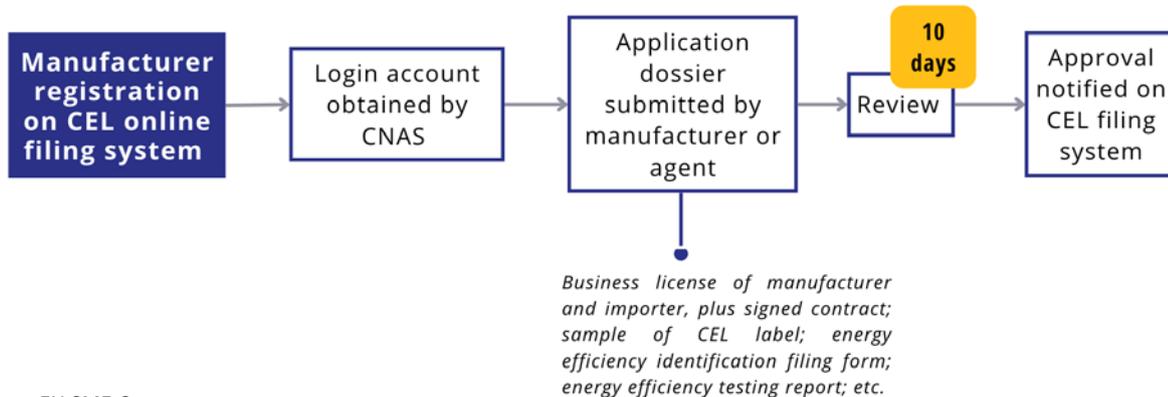
*Law*. The manufacturers of specific products – both domestic and imported – are required to attach a **China Energy Efficiency label (CEL)** to their goods in order to be compliant for sale in China. The label informs Chinese consumers of the product's efficiency, usually displayed on a scale from one to five or one to three, where a green one is the most efficient, whereas the highest number is the least efficient and displayed in red. Further information such as manufacturer name,

product type, energy consumption and applicable GB standard are also displayed.

The products required to use the CEL label are listed in a dedicated *Product Catalogue for Energy Efficiency Labels*, which is regularly updated by CNAS – the designated competent body by NDRC and SAMR. Currently in its 17<sup>th</sup> edition, the **CEL Catalogue covers a total of 38 products**:<sup>18</sup> washing machines, air conditioners, household appliances, monitors, LCD and plasma TVs, water heaters, rice cookers, fans, lamps, etc. The Catalogue details for each product the specific standards, implementing rules, and labels design requirements that must be followed.

To obtain the CEL label, the manufacturer (or their authorised representative) must first register for an account on the **China Energy Efficiency Label Online Filing System** (<https://www.energylabel.com.cn/index.htm>) and fill in basic information *before* their products can be imported or placed on the Chinese market. After

#### The CEL filing system



Source: EU SME Centre

16 [http://www.cnca.gov.cn/zw/gg/gg2020/202009/t20200908\\_63989.shtml](http://www.cnca.gov.cn/zw/gg/gg2020/202009/t20200908_63989.shtml) (accessed: 12 Nov 2025).

17 [https://www.ndrc.gov.cn/xxgk/zcfb/fzggwl/201603/t20160308\\_960813.html](https://www.ndrc.gov.cn/xxgk/zcfb/fzggwl/201603/t20160308_960813.html) (accessed: 12 Nov 2025).

18 <https://www.ndrc.gov.cn/xxgk/zcfb/ghxwj/202004/P020200427594125796613.pdf> (accessed: 12 Nov 2025).

a preliminary review, the manufacturer will receive login information, through which the full application dossier must be submitted. The application dossier includes the business license, a sample of the CEL label, as well as the energy efficiency identification filing form, and an energy efficiency testing report. After assessment by the competent authority, all approved applications will be published through the CEL filing system (see the illustration on the next page).

It is noteworthy that the necessary **energy efficiency testing** must be carried out in a CNAS-qualified laboratory. Manufacturers' own laboratories are also eligible, if they are registered in advance through the CEL platform, and that testing is conducted in line with relevant standards.

For more insights on the practical implementation of the CEL label, including existing challenges and policy recommendations, see a study funded by the EU in 2019-2020.<sup>19</sup>

### 3.3 HAZARDOUS SUBSTANCES IN ELECTRIC PRODUCTS – CHINA ROHS II

Similar to the EU, China has issued regulations **restricting the use of hazardous chemicals in electronic and electrical products** – which are defined as equipment and supporting products that work by relying on electric currents or electromagnetic fields, or are manufactured to generate, transmit and measure those; the usual rated working voltage (V) for these products should not exceed 1500V in direct current or 1000V in alternate current.

The first regulation was issued in 2006 (commonly referred to as China RoHS), and was updated in 2016 (China RoHS II);<sup>20</sup> together with the relevant implementing standard *GB/T 26572-2011*<sup>21</sup>, it stipulates detailed **concentration limits of six hazardous substances**, which are the same as used in the EU RoHS II scheme):

Hazardous substance	Limit
Cadmium (Cd) and its compounds	0.01%
Mercury and its compounds	0.1%
Lead (Pb) and its compounds	0.1%
Hexavalent chromium (Cr6+) and its compounds	0.1%
Polybrominated biphenyls (PBB)	0.1%
Polybrominated diphenyl ethers (PBDE)	0.1%

The above limits apply to all products listed in the **Catalogue of Electronic and Electrical Products Subject to Mandatory Compliance Management** – which was issued by MIIT in 2018 and includes 12 categories.<sup>22</sup> Products included in the Catalogue must go through a **mandatory conformity assessment** to demonstrate their compliance with the concentration limits. Relevant manufacturers (or their authorised representatives) may choose between two different conformity assessment procedures, which were detailed in May 2019 by MIIT and SAMR:<sup>23</sup>

- **Self-declaration:** It is done independently by the manufacturer or its representative. The first step is to register an account on the official RoHS platform (<http://www.rohschina.cn/index>) and submit the relevant application dossier within 30 days after the product has been placed on the Chinese market. The application dossier includes a **test report obtained:**
  - From a qualified laboratory (either third-party or internal one, provided that the technical requirements of *GB/T 26572* and *GB/T 26125* are met)
  - Or by preparing a conformity report based on the determination of the hazardous substances of all components, parts, elements and

19 [https://cfsd.org.uk/wp-content/uploads/2022/01/China\\_EU-ecodesign-Key-findings-policy-recommendations-China-GDP-GP-EL-English.pdf](https://cfsd.org.uk/wp-content/uploads/2022/01/China_EU-ecodesign-Key-findings-policy-recommendations-China-GDP-GP-EL-English.pdf) (accessed: 12 Nov 2025).

20 [http://www.gov.cn/gongbao/content/2016/content\\_5065677.htm](http://www.gov.cn/gongbao/content/2016/content_5065677.htm) (accessed: 12 Nov 2025).

21 <https://openstd.samr.gov.cn/bzgk/gb/newGbInfo?hcno=709EEDE5BF49ACDD34DB85F466D715E8> (accessed: 1 Nov 2022).

22 Namely: (i) refrigerators; (ii) air conditioners; (iii) washing machines; (iv) water heaters; (v) printers; (vi) copiers; (vii) fax machines; (viii) TV sets; (ix) monitors; (x) microcomputers; (xi) cell phones; (xii) telephones. See: [http://www.gov.cn/zhengce/zhengceku/2019-10/14/content\\_5439264.htm](http://www.gov.cn/zhengce/zhengceku/2019-10/14/content_5439264.htm) (accessed: 12 Nov 2025). It is noteworthy that the same document also lists a total of 39 products for which exemptions can be made.

23 [https://gkml.samr.gov.cn/nsjg/rzjgs/201905/t20190517\\_293827.html](https://gkml.samr.gov.cn/nsjg/rzjgs/201905/t20190517_293827.html) (accessed: 12 Nov 2025).

raw materials  
 – based on the *Rules for Conformity Declaration of Suppliers with Restricted Use of Hazardous Substances in Electrical and Electronic Products*.<sup>24</sup>



Once the application is approved, SAMR, MIIT and CNCA will publish the results of the conformity assessment on CNCA's public platform, and issue a **mark** implying the usage of the self-declaration approach.

• **Voluntary third-party certification:**

It is usually conducted by designated certification bodies. The process is roughly the same, with the main difference that the test report must be necessarily issued by a qualified laboratory, and that a factory inspection will be conducted by Chinese auditors. Once the application is approved, a relevant certificate will be granted and the product can be introduced to the Chinese market. The results will be notified publicly by SAMR, MIIT and CNCA, and a specific **mark** will be issued. Follow-up audits and inspections will however be conducted on a regular basis after the approval.



In addition to the above, relevant products must also be **properly marked** in line with *SJ/T 11364-2014 Marking for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products*. Two marks exist:



*Mandatory mark, in orange, for products exceeding concentration limits. The number (which may vary) refers to the timeframe of safe usage of the product, at the end of which it should enter into the recycling system.*



*Mandatory mark, in green, declaring that the product is totally free from the hazardous substances. It is a green and environment-friendly product which can be safely recycled.*

Furthermore, for all electrical products in the RoHS catalogue as well as those which are not yet have

DC ≤1500V or AC ≤1000V, product manufacturers or importers must include a detailed table specifying the names and contents of hazardous substances, as well as the parts where these are used in the **product instruction / user manual** (see example below).

If an electronic and electrical product is not in the Catalogue (or is in the list of exemptions), **it can exceed the above concentration limits** of hazardous substances and still allowed to entry in the Chinese market – **provided that it is properly marked** in line with *SJ/T11364-2014*. The whole process is summarised in the scheme on the next page.

Finally, it must be noted that China RoHS II marking is required for finished products only; suppliers of components used in the manufacturing process are exempted from the marking requirement, but they must still notify their clients to assist them in determining the hazardous content.

**NB:** On 1 August 2025, the State Administration for Market Regulation (SAMR) officially released a new standard, GB 26572-2025, Requirements for Restricted Use of Hazardous Substances in Electrical and Electronic Products.<sup>25</sup> It will come into force on August 1, 2027.

According to the Standard, electrical and electronic products fall into two categories:

- Class I: Those listed in the official Compliance Management Catalog for the Restriction of Hazardous Substances in Electrical and Electronic Products must meet mandatory substance restriction limits and carry a compulsory label.
- Class II: Products not included in the catalog are encouraged to comply with the limits but are still required to be labeled.

The new standard mandates strict limits on 10 toxic chemicals in electrical and electronic products, including four heavy metals (lead, mercury, cadmium, and hexavalent chromium), and six persistent organic pollutants such as polybrominated biphenyls (PBBs), polybrominated diphenyl ethers (PBDEs), and four types of phthalates.

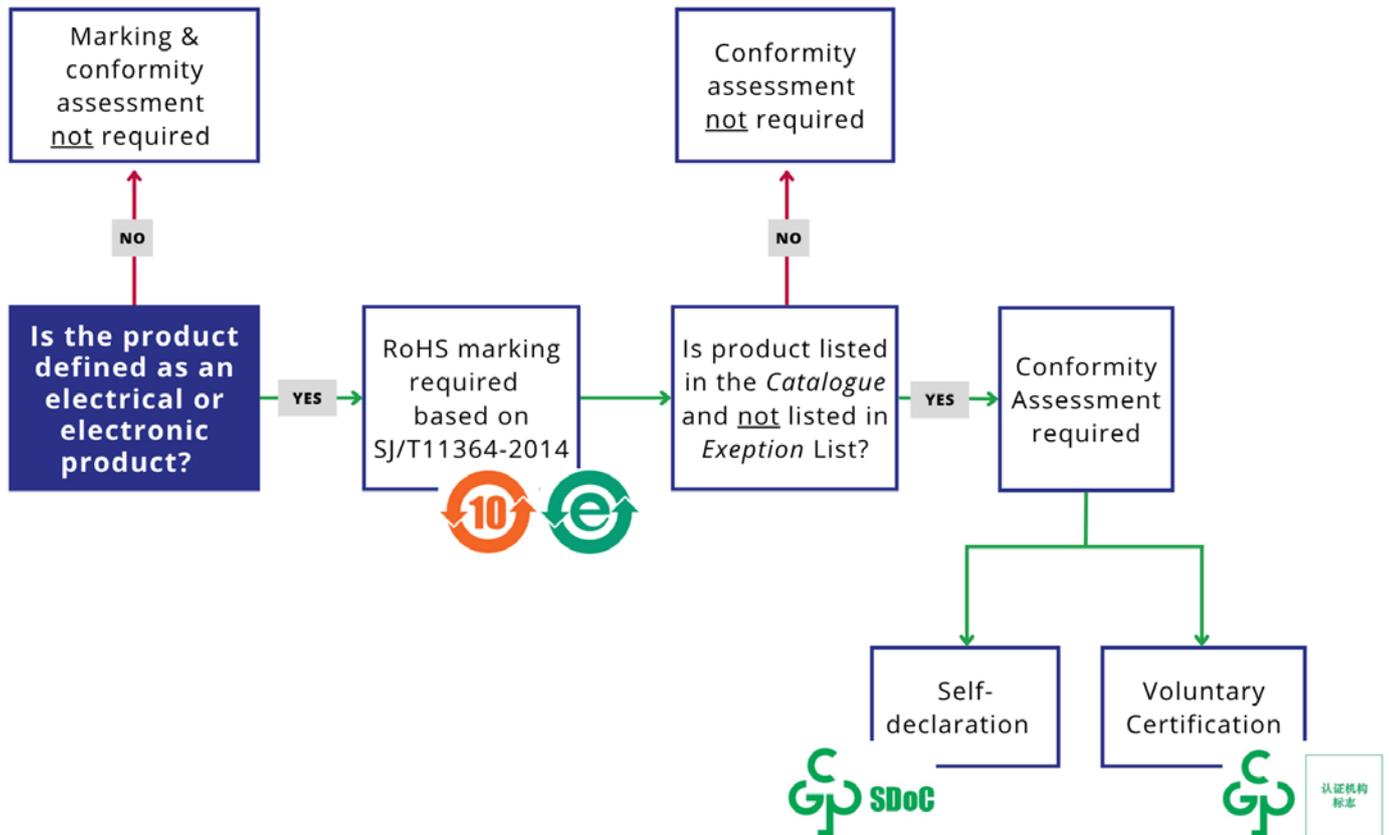
More information is available on the [SESEC's website](#).<sup>26</sup>

<sup>24</sup> <http://www.gov.cn/zhengce/zhengceku/2019-11/07/5449863/files/60de1254f74d4d9c8fca628ff4a32166.docx> (accessed: 12 Nov 2025).

<sup>25</sup> <https://std.samr.gov.cn/gb/search/gbDetailed?id=3B49408EC36C0811E06397BE0A0A2D54> (accessed: 14 Nov 2025).

<sup>26</sup> <https://sesec.eu/2025/news-events/news/china-introduces-mandatory-rohs-standard-gb-26572-2025/> (accessed: 14 Nov 2025).

**Should your product undergo marking and/or conformity assessment?**



Source: EU SME Centre

## 4. VERTICAL CERTIFICATION SCHEMES: EXAMPLES

In addition to horizontal certification, marking and licensing schemes that may apply to different industries, some products may *also* need to comply with **vertical schemes** that apply only to their specific product categories or subcategories. This section provides two examples of telecommunication equipment and

cosmetics. Vertical schemes may exist as well for other industries or categories, e.g., organic certification for food and beverage products (voluntary by nature but becoming mandatory if the producer wishes to market its product as organic).

### 4.1 TELECOMMUNICATION EQUIPMENT – RADIO TYPE APPROVAL (SRRC)

In addition to obtaining CCC certification and complying with China RoHS II, all telecommunication equipment and devices that use frequency bands, such as WLAN, Bluetooth or 4G/5G, are required to obtain the **Radio Type Approval certificate** from the State Radio Regulatory Commission (commonly referred to as SRRC certification), and affix the relevant **code** to the product.<sup>27</sup> The purpose of the SRRC certification is to demonstrate compliance with China's technical standards for radio transmission. Medical devices, e-transport systems and industrial equipment are generally excluded from this requirement, while Internet-of-Things devices are not.

To obtain the SRRC certification, product manufacturers (or their representatives) must conduct a **type test in an accredited lab in China**<sup>28</sup> which tests the core parameters of the product such as frequency range, tolerance, transmitting power, occupied bandwidth, and spurious emission limits.

The results of the type test must match exactly the parameters specified in the application documents. A prerequisite for obtaining the SRRC certification is to have already obtained an **ISO 9001 certificate** – which must be submitted as part of the application materials. The application process is summarised below.

After completion, a Radio Type Approval certificate will be issued, which contains a **12-digit CMIIT ID** code that must be affixed to the product. The code will be valid for 5 years and must be reviewed afterwards; all existing CMIIT ID codes can be consulted on MIIT's website (<https://ythzxfw.miit.gov.cn/resultQuery>). It is noteworthy that the SRRC certificate and CMIIT ID code must be obtained for each model with one frequency band.

NB: Since September 2022, it is possible, on a trial basis, for some companies to do the testing and certification themselves.<sup>29</sup>

In addition to the above, if telecommunication equipment needs to be connected to the public telecommunication network in China (mobile phones, modems, Ethernet switches, telecom terminals, etc.), then it must *also* obtain a **Network Access License (NAL)** to be allowed to be sold.

<sup>27</sup> More details on the SRRC website: <https://www.srrc.org.cn/detection1.aspx> (accessed: 12 Nov 2025).

<sup>28</sup> A list of accredited labs is available at: [http://www.ccia.org.cn/news\\_show.php?id=9890](http://www.ccia.org.cn/news_show.php?id=9890) (accessed: 12 Nov 2025).

<sup>29</sup> [https://www.gov.cn/zhengce/content/2022-09/23/content\\_5711385.htm](https://www.gov.cn/zhengce/content/2022-09/23/content_5711385.htm) (accessed: 12 Nov 2025).

## 4.2 COSMETICS – NOTIFICATION/REGISTRATION CERTIFICATE

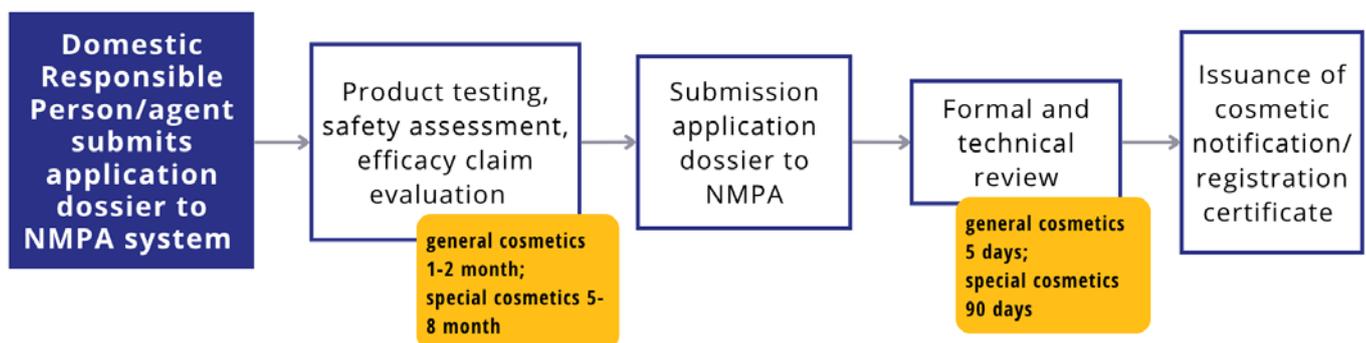
The *Cosmetics Supervision and Administration Regulation* stipulates that all cosmetics imported and domestically produced must obtain a **Cosmetic Product Registration Certificate** from the National Medical Products Administration, in order to be sold in China. The certificate demonstrates the alignment with Chinese standards and thus the quality, safety and efficacy of the cosmetics for Chinese consumers. The process for obtaining the certificate depends on the type of cosmetic product:

- Special cosmetics: including (i) hair dyes; (ii) hair perming products; (iii) freckle-removing (whitening) products; (iv) sunscreens; (v) anti-hair loss products; and (vi) cosmetics with new efficacy. A costly **registration process** taking 12 to 16 months.

- General cosmetics: all other cosmetics products not falling within the scope of 'special cosmetics'. A simpler **notification process** taking 4 to 6 months.

Finally, it is noteworthy that also **new cosmetic ingredients** – not only final products – must go through a similar process to obtain the cosmetic ingredient certificate before the ingredients are allowed to be used for cosmetics products sold in China.

### Obtaining a Cosmetics Product Registration Certificate



Source: EU SME Centre

More details on the registration for cosmetics, as well as animal testing requirements, are available in a **webinar recording** from an event organised by the EU SME Centre in November 2025: <https://www.eusmecentre.org.cn/publications/china-cosmetics-regulatory-framework/>



## CASE STUDY: TEXTILE AND APPAREL PRODUCTS

All textile and apparel products must be fully compliant with the mandatory standard *GB 18401-2010 National general safety technical code for textile products*. The standard divides textile and apparel products in three categories:

- Type A: Products for infants (less than 36 months of age)
- Type B: Products with direct skin contact
- Type C: Products without direct skin contact.

For each category, the standard stipulates the **maximum limits of hazardous substances** that can be included in products, specifically:

Item	Type A products	Type B products	Type C products
Formaldehyde (mg/kg)	≤20	≤75	≤300
pH value	4.0 ~ 7.5	4.0 ~ 8.5	4.0 ~ 9.0
Colour fastness	Water	3 - 4	3
	Acid perspiration	3 - 4	3
	Alkaline perspiration	3 - 4	3
	Dry rubbing	4	3
	Saliva	4	/
Odor	Odorless		
Decomposable carcinogenic aromatic amine dyes (mg/kg) <i>* Detection limit ≤20 ppm</i>	Prohibited		

In addition, textile products used by **infants and children** must also comply with the mandatory standard *GB 31701-2015 Safety technical code for infant's and children's textile products*. The standard divides such products into three categories:

- Type A: Products for infants (less than 36 months of age)
- Type B: Products for children (3 to 14 years of age) with direct skin contact
- Type C: Products for children (3 to 14 years of age) without direct skin contact.

For each category, the standard stipulates the **maximum limits of hazardous substances** that can be included in products, specifically:

Item	Type A products	Type B products	Type C products
Colour fastness to wet rubbing / (grade) >	3	2-3	/
Heavy metals / (mg/kg) <	Lead	90	/
	Cadmium	100	/
Phthalates / (%) <	DEHB, DBP, BBP	0.1	/
	DINP, DIDP, DNOP	0.1	/
Flammability	Class I		

All textile and apparel products imported or produced in China must comply with the above requirements. Compliance needs to be demonstrated through testing in qualified laboratories: test reports will need to be submitted when inspected by customs authorities.

At the same time, textile products must further comply with relevant standards for labelling. The most common is GB/T 5296.4-2012 Instructions for use of products of consumer interest — Part 4: Textiles and apparel, which was originally mandatory but is since 2017 voluntary. In general, the following information must be specified on labels:

- (i) Name and address of the manufacturer;
- (ii) origin of production, name and address of importers/distributors for imported products in China;
- (iii) product size or specifications;
- (iv) fibre content and composition;
- (v) care instructions;
- (vi) product standard executed;
- (vii) safety category in line with GB 18401;
- (viii) product quality grade;
- (ix) usage and storage conditions (optional).

### Information that must be specified on textile labels

**Hang tag**

Brand : XXXXX  
 Name : Children's shirt  
 Size : 135/60  
 Main fabric : 100% Cotton  
 Standard : GB/T 31900-2015  
 Grade of product quality : Qualified products  
 Safety category : GB 31701 category B  
 Inspector : 02  
 Washing label :  
 Business Name : XXXXXXXX  
 Business Address : XXXXXXXX  
 Business Telephone : XXXXXX

**Permanent label**

Size : 135/60  
 Main fabric : 100% Cotton  
 Washing label :  
 ②/③/⑥:  
 - Marked on the permanent label  
 - Keep them consistent

Screenshot from EU SME Centre training in January 2022 "Export and marketing requirements for fashion and apparel brands":  
<https://www.eusmecentre.org.cn/event/2022-01-24/export-and-marketing-requirements-fashion-and-apparel-emerging-brands>

Labels can be of various forms, including hang tags and durable labels. Durable labels should include three sections:

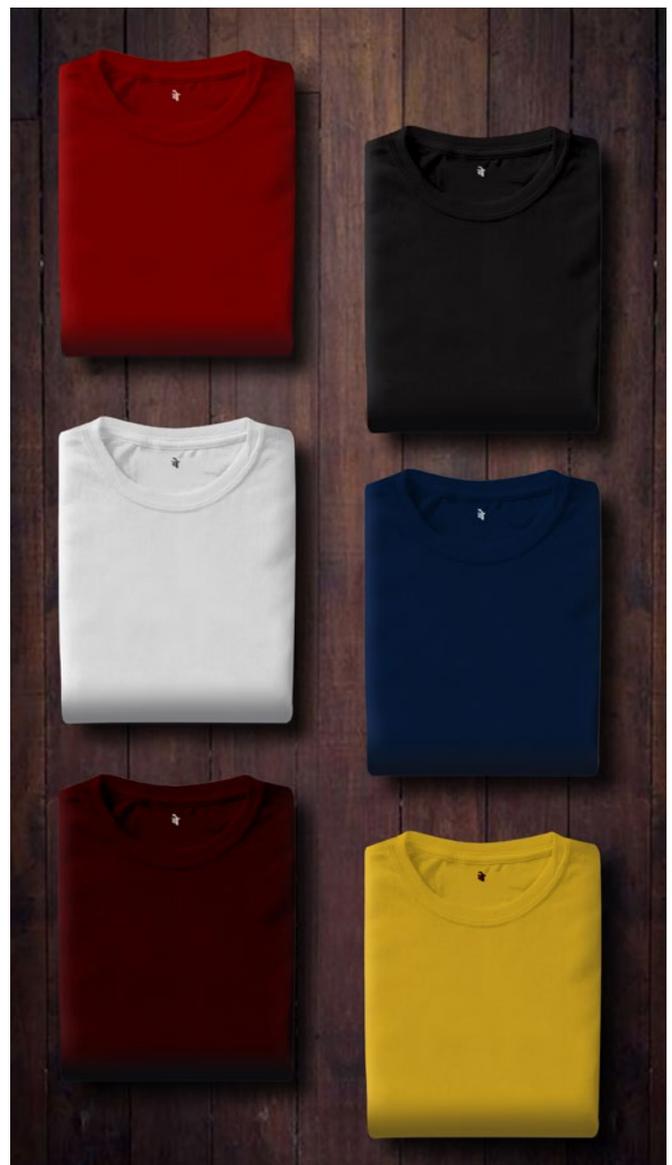
- (i) product size or specification;
- (ii) fibre content and composition;
- (iii) care instructions.

See an example of a label above (all information must be in Chinese).

At the same time, additional standards exist for specific types of products, both mandatory and voluntary, for instance:

- Safety specifications for various types of footwear (children: GB 30585-2024; rubber shoes: GB 25038-2024; athletic shoes: GB 21536-2024; etc.); safety specifications for leather and fur (GB 20400-2006); etc.
- Additional recommended requirements for various products, in terms of design, labelling, packaging, transportation, test items, etc. (e.g. down clothing: GB/T 14272-2021; labelling and marking of footwear: QB/T 2673-2023; cloth shoes: QB/T 4329-2012; Jeanswear: FZ/T 81005-2017; knitted shirts: FZ/T 73043-2020; dog apparel: FZ/T 81013-2016); etc.

Finally, textile and apparel products do not need to comply with any of the horizontal schemes introduced in this report, in particular the China Compulsory Certification.



# SEND US YOUR QUESTIONS



For any questions or free-of-charge consultations, European SMEs may contact the EU SME Centre via our **Ask-the-Expert** service: <https://www.eusmecentre.org.cn/ask-the-expert/>.

# FURTHER RESOURCES

## FAQ

The EU SME Centre has a set of FAQs with a dedicated section on standards and compliance:

<https://www.eusmecentre.org.cn/FAQ/>

## WEBINAR PRESENTATION

**Webinar presentation by SESEC – Updates on China Compulsory Certification (2024):**

<https://www.eusmecentre.org.cn/wp-content/uploads/2025/11/SESEC-V-Webinar-14-Updates-on-China-Compulsory-Certification-CCC.pdf>

# ABOUT THE EU SME CENTRE

The EU SME Centre is an initiative funded by the European Union to assist small and medium-sized enterprises (SMEs) from EU Member States and countries participating in the Single Market Programme, getting them ready to do business in China.

Our core mission is to facilitate market access and provide a comprehensive range of free first-line services to inform, advise, train, and connect SMEs. The Centre forms partnerships with business support organisations and trade promotion organisations to bring our services and expertise to European SMEs of all sectors.

This initiative created in 2010 is now in Phase V (2025-2028) and is implemented by 4 consortium partners with 2 associated partners, with networks throughout Europe and China.

## Consortium partners



## Associated partners



## AMONG OUR KEY ACTIVITIES



### ADVICE

Practical and confidential advice on doing business in China



### ADVOCACY

A coherent, consistent, and consolidated voice for EU SMEs



### KNOWLEDGE

A free library of resources on market access, sectorial guidelines and more



### TRAINING

Getting your company ready for every stage of business in China