

China

Reform of 3C self-declaration regime



ASIA

■ REMINDER OF 3C REGIME

The China Compulsory Certificate regime (hereinafter the “3C Regime”) was established in 2002 and applies to both imported goods as well as to products sold domestically in China.

Basically, for products on 3C Regime catalogue to be imported, sold and/or used in the business activities in China, a 3C mark shall be obtained.

During a very long time, all products concerned had to go through the official certification by third party (hereinafter the “Classic certification”) to receive 3C mark, which involves especially the products testing in laboratory, the factory audit, etc.

In 2018, through two announcements issued respectively in June and in December, the Chinese authorities removed certain products from 3C Regime and in parallel introduced, for the first time, the “3C self-declaration” (hereinafter the “Self-declaration”) to replace the Classic certification process for some other groups of products. The companies had however the right to choose to apply the Classic certification process or the Self-declaration process.

■ RECENT REFORM – EXTENSION OF THE SELF-DECLARATION PRODUCTS LIST AND COMPULSORY CONVERSION TO THE NEW MODE

In October 16, 2019, the Chinese market regulation authority (SAMR¹) issued the <Announcement No. 44> which, with immediate effect:

- Extended the list of products subject to “self-declaration” to a total of 28 categories of products, including notably automotive components such as safety belts, exterior lighting, travelling data recorder etc.;
- Provides that as from January 1, 2020, products subject to Self-declaration mode can only get 3C mark through Self-declaration process, and that the 3C certificate will stop being issued to these products;
- Requires that all affected products which already obtained 3C certificate (through classic certification process) need to be converted to Self-declaration mode before **October 31, 2020**.

■ PROCESS OF 3C SELF-DECLARATION

Following the Announcement No. 44, the Chinese certification authority CNCA² issued, in December 25, 2019, the announcement No. 26 to provide more detailed information on Self-declaration regime and relevant requirements, and published the updated version of Self-declaration Implementation Rules.

1 i.e. State Administration for Market Regulation

2 i.e. Chinese Administration of Certification and Accreditation



1. GENERAL PROCESS OF SELF-DECLARATION

- [Evaluation methods](#)

The most important element in the regime of Self-declaration is products testing (usually called “sampling test”) to be conducted by a laboratory. Depending on the type of products, the testing can be made by a laboratory **self-selected** by the company or by a **laboratory designated** by the authority.

Regarding the factory audit, and contrary to the Classic certification process in which the audit must be conducted by a qualified third party, under “Self-declaration” mode, a **self-inspection** organized by the manufacturer will be sufficient. The manufacturer shall issue and submit a self-inspection report about the factory’s compliance with quality standards and requirements.

Alternatively, the manufacturer can, if it wishes, engage a qualified certification body for an “official certification”, it is then such certification body who will conduct the products testing and factory audit. As the end of this “official certification”, the certification body will issue a product quality certificate, a testing report and a factory inspection report.

- [Information reporting](#)

After the products testing and self-inspection of factory (or, as the case may be, the official certification by a qualified certification body) are done, the manufacturer, laboratory or the certification body (if involved) shall register in the <3C Self-Declaration Information Reporting System> and upload the relevant information.

The manufacturer shall especially submit its auto-inspection report showing the factory’s compliance with quality standards and requirements. The laboratory shall especially submit its testing report and relevant details. The certification body, where involved, shall submit the products quality certificate, the testing report and the factory audit report.

Once all required information is submitted, a document named <Self-Declaration of CCC Conformity> (“**SDoC**”) will be generated automatically by the system. The authorized signatory of the manufacturer or its representative shall sign the document then upload it to the system, which marks the completion of the Self-declaration procedure. This document replaces the 3C certificate and shall be presented to demonstrate the compliance of the products.

- [Marking of 3C logo](#)

After the SDoC is obtained, the 3C logo then can be affixed on the products.

2. SIMPLIFIED PROCESS

For products already holding a 3C certificate and now subject to Self-declaration regime, it is not necessary to redo the products testing, since the CNCA accepts the old testing reports. In practice, via the certificate number, the CNCA reporting system will automatically link the products under Self-declaration and testing report, and the applicant only need to enter and confirm all the information before signing the SDoC.

After the Self-declaration is completed, the initial 3C certificate will be revoked by the issuing certification body.

■ DS COMMENTS

Given the recent series of developments regarding 3C regulation, we suggest to overseas manufacturing companies who are exporting products to China to:

- Check, at the first, whether the products exported to China have been included in the latest <Self-declaration Products List> or not;
- If yes, in order to anticipate the next exportations, launch the Self-declaration process as soon as possible;
- If some of the products already get 3C certificate, ask its subsidiary or its importer/dealer in China to complete the conversion to Self-declaration by **October 31, 2020**.

It is worth mentioning that the Self-declaration system does not remove the 3C compliance requirements for the products - all national GB standards and CNCA rules remain valid. To ensure that the products are compliant, or to assure the clients, the manufacturer can obtain a voluntary certification in addition to 3C Self-declaration, such as CQC¹ certification or, for automotive products, CCAP² certification.

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- 1 i.e. China Quality Certification Center
 - 2 i.e. China Certification Centre for Automotive Products



For any additional information
please contact:

Liu Yijun
Legal & Tax Advisor - Shanghai Office
liuyijun@dsavocats.com

CHEN Xiaoyun
Associate - Beijing office
chenxiaoyun@dsavocats.com

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