

# Ask the TIC

## China's CCC Mark: A Guide for U.S. Exporters

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*New product quality and safety rules may affect your company's exports to the People's Republic of China.*



### What is the CCC Mark?

The China Compulsory Certification (CCC) mark is China's newest quality and safety mark. Since 1989, the People's Republic of China has had a safety licensing system, which included the CCIB mark (for products in 47 categories) and the CCEE "Great Wall" mark (for electrical commodities in seven categories). As the certification system grew through the 1990s, many companies exporting to China raised concerns about the dual certification systems, redundant testing, and different treatment of domestic and imported products. The CCC mark system merges the earlier marks, and it entails many of the same requirements as the previous certifications. China's Certification and Accreditation Administration (CNCA) oversees the new standards system, which was developed in response to the requirements of the country's accession to the World Trade Organization.



### Which Products Must Have the CCC Mark?

There are 132 types of products that require the CCC mark. A list of the specific products is available on the China Gateway site: [www.mac.doc.gov/China/Docs/BusinessGuides/cccguide.htm](http://www.mac.doc.gov/China/Docs/BusinessGuides/cccguide.htm).



### When Do These Requirements Take Effect?

The CCC mark became effective on May 1, 2002. The Chinese government provided for a one-year transition period during which products requiring certification could enter China with one of the prior marks. However, as of May 1, 2003, exporters whose products require certification must bear the CCC mark.



### What is the Typical CCC Mark Application Process?

#### Step One: Determine Whether Your Products Require CCC Marking

First, examine the CNCA's product catalogue and determine whether your products, or component parts within your finished goods, require CCC marking. The product catalogue is a list, divided into broad product categories, of all the products requiring CCC marking. You can access the catalogue on the China Quality Certification Center's site: [www.cqc.com.cn/cc/catalogueeng.pdf](http://www.cqc.com.cn/cc/catalogueeng.pdf).

If the short descriptions in the product catalogue are not specific enough to determine whether the CCC mark applies to your product, you have two other options:

- Review the CNCA's "Implementation Rules" booklets, described in Step Two below. The 47 booklets each provide a "scope" section, which in some cases provide a more detailed description of which products require the CCC mark.
- Review the CNCA's "Announcement 60," a table linking HS codes to products that require the CCC mark (see [www.cnca.gov.cn/board/bianmabiao.htm](http://www.cnca.gov.cn/board/bianmabiao.htm)). The document is only available in Chinese, but you may be able to locate the HS codes of your company's products. You may then want to hire a translator to translate that section. Don't know your HS codes? Check with your shipping department, freight forwarder, or whoever handles your Chinese customs paperwork. Alternatively, contact the Foreign Trade Division of the U.S. Census Bureau. For durable goods, call (301) 763-3259. For non-durable goods, call (301) 763-3484.
- Be aware that component parts of a manufacturer's finished products may in some cases require CCC certification. In those cases, the component manufacturer is generally required to apply for the CCC mark. Also be aware that spare parts and replacement parts shipments may in some cases require CCC certification, or application for an exemption. Your Chinese agent may be able to help clarify these requirements.

#### Step Two: Get the Implementing Regulations

The CNCA has published 47 "Implementation Rules for Compulsory Certification." The booklets are available in English on-line: [www.cnca.gov.cn/download/english.html](http://www.cnca.gov.cn/download/english.html). The booklets list technical application requirements for each of the product categories. The rules cite numerous "GB Standards," which are mandatory national standards. Information on mandatory standards is available from the following agency:

**WTO/TBT National Enquiry Point  
 Administration of Quality Supervision, Inspection, and  
 Quarantine People's Republic of China**

Tel: +86-10-856-22885  
 Fax: +86-10-856-22884  
 E-mail: [tbt@aqsiq.gov.cn](mailto:tbt@aqsiq.gov.cn)

#### Step Three: Consider Your Options for Applying

Some companies use agents or consultants to manage their CCC mark applications. Other companies apply on their own, or rely on their importers or distributors. Check with your Chinese partners, distributors, or your export managers. They may have experience with the CCC mark and can point you to other resources.

If you elect to use a consultant, several U.S. firms can help you apply and manage your applications for CCC certification.

The U.S. Department of Commerce is aware of several such firms, but it cannot endorse any individual company. A list of companies is available on [www.mac.doc.gov/China/Docs/BusinessGuides/cccguide.htm](http://www.mac.doc.gov/China/Docs/BusinessGuides/cccguide.htm).

#### Step Four: Apply

If your company elects to handle the application process, your first step should be to visit the Web site of the China Quality Certification Center (CQC): [www.cqc.com.cn/index-e.htm](http://www.cqc.com.cn/index-e.htm). At this site, click on the "CCC Application On-line Guide," a document with step-by-step instructions on how to apply for the CCC mark. Application is a five-step process:

1. Application. This means submission of an application and supporting materials, including user guides, CB reports, EMC (electro-magnetic compatibility) reports, regulatory labels, and other information.
2. Type testing. A CNCA-designated test laboratory in China will test product samples.
3. Factory inspection. The CQC will send representatives to inspect the manufacturing facilities of your product. They will inspect each factory producing your product. For example, if your company manufactures Product Z in five separate factories, all of which ship product to China, you will need to have five separate factory inspections. Please note that Chinese inspectors will need U.S. visas to visit U.S.-based facilities. The U.S. State Department is now subjecting visa applications to a greater degree of scrutiny than in the past, and visa applicants are being advised to expect delays. These visa delays may slow your CCC application.
4. Evaluation of certification results, followed by approval (or failure or retesting).
5. Follow-up factory inspection. Chinese officials will re-inspect the product's manufacturing facilities every 12–18 months.



#### How Long is the Certification Process?

The application process for the CCC mark typically takes 60 to 90 days, but it may be longer.



#### Are There Other License Requirements with which I Must Comply?

China has multiple certification schemes. Though the CCC mark is the widest-ranging certification requirement, your product may have to meet other requirements as well. For example, China's Ministry of Information Industry regulates telecommunications and Internet equipment, and for certain equipment it requires manufacturers to obtain a "network access license" and "network access identifier mark," which includes requirements for testing in Chinese laboratories. Similarly, China's State Drug Administration requires product registration for certain medical devices.



#### How is the U.S. Government Addressing Problems U.S. Companies Face?

The U.S. government is working closely with Chinese officials to answer the questions of U.S. exporters and advocate on behalf of U.S. industry interests. The U.S. government is negotiating with the Chinese government in high-level meetings in Washington, Beijing, and Geneva, as well as regular working-level discussions. Additionally, the U.S. Commerce Department has coordinated extensively with U.S. businesses in order to address their concerns and is organizing local seminars to publicize the new requirements at the following U.S. Export Assistance Centers:

- May 5, 2003: Newport Beach, Calif.
- May 6, 2003: Portland, Ore.
- May 7, 2003: Seattle, Wash.
- May 8, 2003: Indianapolis, Ind.

As the deadline for CCC registration approaches, the Commerce Department can provide information on the CCC mark system. Additionally, the U.S. government, in its role as an advocate for U.S. industry, can, where appropriate, raise your questions or concerns directly with the Chinese government.

If your company encounters difficulties with the CCC system or has trade policy concerns, contact:

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U.S. Department of Commerce  
Tel: (202) 482-5316  
Fax: (202) 482-1576  
E-mail: [Timothy\\_Wineland@ita.doc.gov](mailto:Timothy_Wineland@ita.doc.gov)



#### Where Can I Find Additional Assistance?

For help with any export-related question, contact the U.S. Commerce Department's Trade Information Center:

Trade Information Center  
Tel: (800) USA-TRADE  
E-mail: [tic@ita.doc.gov](mailto:tic@ita.doc.gov)  
Web site: [www.export.gov/tic](http://www.export.gov/tic)

#### FOR MORE INFORMATION

The Trade Information Center (TIC) is operated by the International Trade Administration of the U.S. Department of Commerce for the 19 federal agencies comprising the Trade Promotion Coordinating Committee. These agencies are responsible for managing the U.S. government's export promotion programs and activities. You, too, can "Ask the TIC" by calling (800) USA-TRAD(E) toll free, Monday through Friday, 8:30–5:30 EST. Or visit the TIC's Web site at [www.export.gov/tic](http://www.export.gov/tic).