

EuropElectro¹ – European Electrical and Electronics Industry’s Position Paper on “P.R.China Standardization Law (NPC Revised Draft)”

To Whom it may Concern,

On 16 May 2017, the National People’s Congress of P.R.China solicited public comments on the “P.R.China Standardization Law (NPC Revised Draft)” (Hereafter referred to as “NPC revision draft”).

As national basic law for standardization, “P.R.China Standardization Law” is of great significance for the exchanging and using of social production, scientific research, and maintaining the interests of groups.

Revising the standardization law is one of the important implementations of “Reform Scheme for Deepening the Standardization Work” (State Council No. 13 of 2015). We appreciate the four principles for standardization reform mentioned in the document:

1. Stick to combination of streaming administration and delegation power to the lower levels and combination of governance and power delegation
2. Stick to the principle of being synonymous with international standards and meeting the national conditions
3. Stick to unified management and division of responsibilities
4. Stick to administration by law and coordination of development

As a representative of the European electrical and electronic industry, we have always been active in supporting the promotion and implementation of standardization law. Now we fully understand and support the revision on the “P.R.China Standardization Law (Revised Draft)”.

In 2016, EuropElectro solicited opinions widely from European electronic and electrical companies regarding the revised draft released by legislative office of state council and proposed detailed and concrete proposals and comments from the manufactures point of view. Comparing last draft and this revised draft from NPC, we’re glad to see quite a few comments have been adopted in this draft version.

Meanwhile, we still have some position and comments coming from manufactures aspect to propose regarding this revised draft from NPC. We sincerely hope regulators take our positions into account when revising the law.

Best Regards,
EuropElectro Office

1. *EuropElectro helps to bring Europe and China closer together in technical legislation, standardization and certification for electrical and electronic products in order to facilitate the trade with these products in both directions. Through the cooperation with ORGALIME we are the voice of our member companies from all over Europe in China.*



A Work Party of ZVEI Frankfurt an Main: 德国电气电子行业协会

合作方:



Orgalime - The European Engineering Industries Association, Brussels
Orgalime - 欧洲工程行业协会, 布鲁塞尔

AHK /GIC- German Chamber of Commerce 德国工商大会, 北京

I. General Comments:

As the national basic law for standardization, "P.R China Standardization Law" is of great significance for the exchanging and using of social production, scientific research, and maintaining the interests of groups. We welcome and appreciate "encourage the active participation of international standardization activities, adoption and promotion of international standards" of Article 6 and "The standards are forbidden to use for undertaking the illegal activities such as industry barrier, district block or illicit competition" of Article 17.

We carefully read and analyzed each article of the revision draft, as well as the "Reform Scheme for Deepening the Standardization Work" (State Council No. 13 of 2015) and related documents. We totally agree with "Standardization reform should focus on making market play a decisive role in the allocation of resources" and "Standardization activities should not be provisions to certification, accreditation and market access".

Totally we proposed 12 comments regarding 11 Articles of the revision draft, focusing in two aspects – the self-declaration publicity system for enterprise products or service standards and standards related issues of imported products, especially related to Article 22:

- 1. We pay high attention to whether the self-declaration publicity system includes importing products or not.** Such as the 'products' appeared in item 2 of Article 22. Does it include "imported products"?
- 2.** When the standards of the enterprise are based on IEC and other international standards or equivalent to the use of international standards with copyright protection, should they be opened to public with the number and content of standards?

We also suggest have enterprises (including FIE), industry associations, consumers and many other different identities fully involved in the standardization work, so that they can devote their creativity and initiative to the continuous and healthy development of standardization.

II. Attachment:

"EE-2017001 -EuropElectros Position Paper on China Standardization Law (NPC Revised Draft)
- Attachment of Comments Form"

ORGALIME -Speaking for European engineering, Orgalime, represents 3 industrial branches (electrical & electronic, mechanical engineering and metal articles & metalworking) that manufacture over 28% of the total EU manufacturing output and has 37 member trade federations in 22 European countries. The industry accounted for some €1,666 billion in 2011. The industry not only represents more than one quarter of the output but also a third of the EU's manufacturing industries exports.

ZVEI –the German Electrical and Electronics Industry Association is one of the world's largest electrical and electronics industry associations. ZVEI represents, with 26 product divisions and 1600 member companies, the German electrical and electronics industry with €178 billion turnover in 2011 and accounts for more than 840,000 employees.