

Kick-off	31 Oct., 2018	Closed
CDV	9 Nov., 2018	Closed
FDV	14 Nov., 2018	Closed
<b>FV</b>	<b>16 Nov., 2018</b>	<b>√</b>

EuropElectro position paper status table

## 对《强制性国家标准管理办法》（征求意见稿）的反馈意见

### Comments on Measures for the Administration of Mandatory National Standards (exposure draft)

#### 一. 总体反馈意见 Overall Feedback:

- 我们欢迎总局制定相关管理规定；我们也乐于从生产者角度最大限度地保护消费者利益。  
We're glad to see SAMR formulating relevant management regulations. We are also pleased to protect the maximum interests of consumers as manufactures.
- 为信息更充分被全社会知晓，我们建议国务院标准化行政主管部门在同一平台统一发布强制性国家标准（包括所有行业）的制修订项目计划、征求意见稿，以及标准的正式发布。  
In order to make the information more fully known to the whole society, we suggest that the standardization administrative department of the State Council release on the same platform of the drafting and revision of the mandatory national standards plan (including all industries), exposure drafts, and the official standards.
- 我们建议有关部门应协调好监管职责，避免多头监管和标准冲突，切实做到“谁审批谁监管，谁主管谁监管”。  
We suggest that relevant departments should coordinate their supervisory responsibilities, avoid multiple-supervision and standards conflicts, and effectively implement “who approves, who supervises; who controls, who supervises”.
- 为避免不必要的资源浪费，我们建议不低于一年的强制性国家标准实施过渡期，且新标准对在售的、不危害消费者人身和财产安全的产品及服务不应构成过度限制。  
In order to avoid unnecessary waste of resources, we recommend a transition period of mandatory national standards of not less than one year, and the new standards should not constitute excessive restrictions on products and services on sold that do not endanger the safety and property of consumers.

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## 二. 具体条款反馈意见 Specific Article and Detailed Feedback:

Article of Measures for the Administration of Mandatory National Standards (exposure draft)	Feedback
<p><b>第十七条</b> 国务院标准化行政主管部门应当将审查通过的强制性国家标准项目在官方网站向社会公开征求意见。征求意见期限一般不少于 30 天。应急项目可视情况缩短征求意见期限。</p> <p>Article 17 The competent administrative department for standardization under the State Council shall publicly solicit opinions from society on mandatory national standards projects that pass the review in its official website. The term for solicitation of opinions is usually not less than 30 days. For emergency projects, the term for solicitation of opinions can be shortened as the case might be.</p>	<ul style="list-style-type: none"> <li>• 建议此条中“应急项目”给予解释说明，包括其概念、负责人等；</li> <li>• 为了征求意见的广泛性，建议明确规定缩短的征求意见期限。</li> <li>• It is suggested that the definition and responsible of “emergency project” in this article to be explained specifically;</li> <li>• In order to solicit the wide range of opinions, it is recommended to clearly define the shortened deadline for soliciting opinions.</li> </ul>
<p><b>第二十条</b>。。。起草组的专家一般来自国内权威专业机构。</p> <p>Article 22 ..... The experts of the drafting group generally come from domestic authoritative professional institutions.</p>	<ul style="list-style-type: none"> <li>• 建议修改为“起草组的专家一般来自国内权威专业机构和企业代表。”</li> <li>• Suggest to change it into “The experts of the drafting group generally come from domestic authoritative professional institutions and industry representatives.”</li> </ul>
<p><b>第二十一条</b> 强制性国家标准应当全文强制，技术内容可验证、可操作，条款表述上应使用强制性表述。其他编写要求按照 GB/T 1.1《标准化工作导则 第 1 部分：标准的结构和编写》有关要求执行。。。</p> <p><b>Article 21</b> The full text of mandatory national standards shall be mandatory and the technical contents shall be verifiable and operable. Mandatory expressions shall be used when clauses are expressed. Other compilation requirements shall be executed in accordance with the relevant requirements stipulated in GB/T 1.1 <i>Directives for the work of standardization-Part 1: Rules for the structures and drafting of standards</i></p>	<ul style="list-style-type: none"> <li>• 建议明确此条中全文的范围，“全文”是否仅仅指正文？是否还包括标准的附录（规范性附录，资料性附录）？</li> <li>• It is recommended to clarify the scope of the full text in this article. Does “full text” only refer to the text? Does it also include a standard appendix (normative appendix, informative appendix)?</li> </ul>