

# A GUIDE TO REGISTERING YOUR WATER TREATMENT PRODUCTS IN CHINA



## Registering your water treatment products for sale in China

All products entering China have to comply with standards set by the General Administration of Quality Supervision, Inspection and Quarantine, whilst also complying with Chinese CCC regulation.

With specific regard to the residential water treatment sector, the Ministry of Health (MOH) must formally approve any residential water treatment product before selling in China.

There remains some doubt as to whether all residential water treatment systems need to be registered at the Ministry of Health. The answer is yes, regardless of whether an electrical supply is present or not. Despite this reiteration, many companies, particularly domestic, don't go through this process at all and are thus selling illegally.

“MOH certification has nothing to do with electrical appliance, it is the must-have certificate for treatment systems and their components”.

[Local expert](#)

### How do I obtain Ministry of Health approval?

The very first step on the road to MOH approval for a foreign company is to find a Chinese representative to act on their behalf during the application. The representative may be a distributor, importer or a professional contractor.

These parties are permitted to represent more than one foreign company at any one time. However, we strongly advise against using a distributor as your representative, for reasons explained below.

If you have your own entity and office here in China, you don't need a Chinese party to represent you.

Using a contractor to help you register your products with the MOH is usually the fastest and smoothest way to obtain certification.

From our experiences around 60% of foreign-based applicants make use of a contractor. Keep in mind that the majority of contractors do not speak English.

The process to obtain MOH approval is broadly split into three steps. These are qualification, testing and permit approval. The whole process is most likely to take between 6 months and 1 year although this varies widely. Generally, the most time consuming part of the application is the initial preparation of necessary documents.

“The whole process can take anywhere from 6 months to 2 years, and it's really more of public relations exercise than anything else”.

[Local expert](#)

### Step One: Qualification

Foreign manufacturers wishing to obtain MOH approval must submit a selection of specified documents including the Ministry of Health Application Form for Health-Related Product Testing, along with copies of the product manual, all translated into Chinese.

Some documents asked for may seem unusual for foreign companies, such as the requirement to submit 'company standards'. If a contractor is used, they can compile these documents on your behalf after receiving the necessary information. If an agent is used, the documentation process alone usually takes between 3 and 6 months.

“Documentation poses a problem, as it's often filled out incorrectly. It's not uncommon for companies to have their documentation returned 5 or even 10 times.”

[Local expert](#)

## Step Two: Testing

Despite this initial lengthy process, the most important step towards gaining MOH approval is testing.

The paperwork must be picked up from the Ministry of Health, then, once completed, must be delivered to the Centre for Disease Control (CDC).

Once the CDC has received these documents, they will pick out 3 sealed units for testing. The documentation is mainly focused on technical specifications.

Once your testing report has been received, which will not specify the actual result of testing, you will need to return this to the Ministry of Health. Think of the testing report as simply another document in your application.

Then you need to pay the testing fee, half of which is paid in the form of a deposit before the testing begins. The testing fee is divided into a 4,000USD 'system test', whilst 'core components' must also be tested separately at approximately 1,500USD per piece.

A typical carbon-filter system possesses two key components. Therefore, using a contractor will likely be the most expensive part of the process.

However, obtaining MOH approval still remains on a par with, or cheaper than, obtaining certification from Western institutions even when contractor fees are included. With a contractor the testing process should take approximately 2 months.

## The Ministry of Health Testing Parameters

The testing process of the Ministry of Health differs from other certifications, such as the National Science Foundation (NSF) certification.

MOH testing comprises three areas: overall performance, spike testing, and extraction. The main difference from NSF certification being the increased emphasis on the spike testing of four specific chemicals, all of which require a minimum reduction of a certain percentage.

The filtered water must then meet China's Standards for Drinking Water Quality (GB5749-2006) requirements. The timeframe required for testing is roughly two months, but again varies widely depending on the volume of applications in the queue at that time.

## Risks Of Using Distributor

You can choose to use a local distributor as your representative in China, but this bears unnecessary risks. We have seen multiple cases of foreign companies trusting their Chinese distributors only to get into trouble when the relationship with their distributors soured. Often times this meant distributors not wanting to hand over the rights to registration.

Hence it's important to ensure you do not transfer too much power to your distributors. This means not letting your distributor handle the registration of your products.

## CASE STUDY:

We recently spoke to a foreign company that has been active in China for several years but does not have an office here. They are primarily active in the Chinese POU market and have been experiencing problems with their MOH certification renewal.

The company had their local distributor register their products with the Ministry of Health, but after a few years decided to end the relationship because the distributor's sales results were disappointing. Around that same time their initial MOH certification expired and they needed a renewal. When they asked their distributor for the necessary documents, he refused. The distributor decided to stall their renewal and demanded a significant amount of money to hand over the documents. The company expressed their frustration at being stuck between expiration and renewal despite repeated attempts to have their certification updated.

"We're stuck in the middle of the process, and it has been over a year".

[Anonymous](#)

## Additional Product Certification

In addition to the compulsory approval from the Chinese Ministry of Health, you can secure additional certification in order to boost your brand's reputation and increase consumer confidence in your product. This can be particularly useful in China where consumer trust is low.

Organisations like the Water Quality Association (WQA), American National Standards Institute and the National Science Foundation are amongst the most well known, and all work together to offer comprehensive certification programs. The WQA also has a presence in China.

## Enhancing Your Brand

Many foreign companies comply with internationally recognized standards from the WQA and NSF, and have all compulsory MOH approval.

The weight of these certificates has given rise to many manufacturers making false claims. As a result of this problem, the NSF has an entire section on their website dedicated to publicizing fraudulent certification. The problem is so big that the NSF officially advises that the only way to be sure of the authenticity of their certification is to check their database, which is available online.

However, there are other ways in order to differentiate your authentic product from those that are fraudulently claiming certification or even directly imitating your brand.

## How can I deal with the numerous fakes in the market?

As one of many cases, in June 2014 a South Korean company selling water filtration and dispensing units fraudulently claimed that its product, and the active carbon filter within, were both registered by the National Science Foundation. Specifically, the company was using the NSF mark on promotional materials in order to sell the product.

The only way for a consumer to verify the authenticity of the certification is to use the online databases provided by the issuer.

Unfortunately, this may be rather difficult for Chinese consumers. This is not a problem unique to NSF certification. Companies selling in China without even the compulsory Ministry Of Health approval are common.

In order to combat this type of problem many companies use serial numbers and warranty cards with the sale of each of their products. These details are monitored through a company database so that each unit sold and all of its specific details are directly traceable.

“The identification of each unit is very important to us”.

[Jeremy Liu](#)

Chinese Business Development Manager at Rainsoft

**Are you considering entering the Chinese market and do you still need to obtain MOH approval for your products? Get in contact with us to learn how we can help guide you through this process.**

# CONTACT US

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