

AmCham China White Paper | 中国美国商会年度白皮书

2018 AMERICAN BUSINESS IN CHINA **美国企业在中国**

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IN CHINA WHITE PAPER
2018 年度美国企业在中国
白皮书

Unless otherwise indicated, all charts are from the 2018 AmCham China *Business Climate Survey*.
若无特别说明，文中所有图表皆来自于中国美国商会2018年度商务环境调查。

All monetary conversions are based on the average 2017 exchange rate of US \$1.00=RMB 7.03.
所有的人民币换算为美元都是依据2017年7.03:1的平均汇率计算的。

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华中(武汉)、东北(大连、沈阳)设有区域办公室

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Visa Policy

Introduction

While there is agreement in Washington that the US immigration system is broken, continuing debate over immigration reform has left American employers frustrated. National security initiatives by the current administration have added to polarization over immigration and led to more controversy. AmCham China urges Congress and the President to work together to enact common sense immigration legislation that would free employers to innovate and create jobs.

While respecting the need to enforce immigration law, AmCham China recognizes that the immigrant workforce provides multiple benefits to the US, including: boosting GDP; increasing employment, wages and income; reducing government deficits; supporting the housing market; and promoting entrepreneurship and innovation that keeps the US economy dynamic.

In China, the unified work authorization system, also known as the “New Work Authorization” policy, was implemented as of April 1, 2017. The Chinese government’s goal in creating this policy lies in developing a best-in-class immigration system and attracting top foreign talent to China. Over the past months the new policy has in general resulted in a unified and simplified application process for foreign nationals with a longer lead time, as well as better monitoring of the foreign working population nationwide.

In those Chinese cities where local authorities are willing to collect feedback from employers and foreign workers, adjustments have been made to implement the new policy, in order to optimize the government processing stage and support the overall goal of the new policy. For example, the Shanghai Foreign Experts Bureau recently released a notice reducing the number of requests for additional information. The Bureau expects the move will reduce the application processing time for both Notification Letters for Work Permits and Work Permits in Shanghai.

Recent Developments: China Visas

New National Policy for Foreign Work Permit Applications

Following a six-month pilot program in 10 selected provincial-level jurisdictions between October 2016 and March 2017, the State Administration of Foreign Experts Affairs (SAFEA) officially released a centralized nationwide work authorization system on April 1, 2017. All foreigners in China are to be granted a work permit card and all applications will be assessed by the local Foreign Experts Bureau moving forward.

Integrating Two Permits into One

Under the new policy, the employment permit and expert permit have been combined and now form one single work permit card. Foreigners who still hold a valid employment permit or expert permit may now change to the new work permit card as soon as they wish or when they renew their permit. AmCham China welcomes this streamlining of bureaucratic requirements, as it simplifies the process for foreigners who wish to work in China.

Categorization of Expats

Under the new policy, foreign individuals working in China will be assigned one of three categories: A, B and C.

Category A: “High-end talent,” including scientists, technical experts, international entrepreneurs, and other specialists.

Category B: Foreign professionals, who qualify under a score assessment, are under the age of 60, hold a bachelor's or higher degree, and have at least two years of relevant work experience. Certain requirements may be relaxed on a case-by-case basis.

Category C: Foreign employees, who engage in temporary, seasonal, non-technical, or service-related work.

Category A foreigners are encouraged to work in China, and are therefore not subject to age restriction or BA degree requirements. Category B foreign workers are subject to quotas based on local market demand, and Category C

签证政策

引言

虽然在华盛顿，人们都认为美国的移民体制已破裂，但对移民美国改革喋喋不休的争论更令美国雇主深感不安。本届政府的国家安全举措也使移民问题两极分化，引发许多争议。中国美国商会（商会）敦促美国国会与总统合作，制定合理移民法律，鼓励雇主创新并创造新的就业机会。

在尊重执行移民法必要性的同时，商会也认识到移民劳工为美国带来了许多好处，包括提高国内生产总值；增加就业、工资和收入；减少政府赤字；支持房地产市场；促进创业和创新，使美国经济保持活力。

中国的统一工作许可制度又称之为来华工作许可新政策于 2017 年 4 月 1 日在全国实施。中国政府制定这一政策的目的是建立一流的移民体系，吸引外国顶尖人才来华。过去的几个月里，新政策总体上统一、简化了外国国民申请程序，使外国国民可以有更长的准备时间，同时也更有助于监管在中国工作的外国人口。

中国一些城市地方政府愿意接受雇主和外国员工的反馈，并已做出调整来实施新政策，以优化政府处理流程、实现新政策的总体目标。例如，上海市外国专家局最近发布了一份关于要求减少附加信息的通知。专家局预计，此举将减少申请上海工作许可和工作许可通知的时间。

最新进展：中国签证

有关外国工作许可申请程序的最新全国政策

2016 年 10 月至 2017 年 3 月期间，国家外国专家局在 10 个省级司法辖区试点实施了为期 6 个月的试点项目，并于 2017 年 4 月 1 日正式发布全国统一实施的外国人来华工作许可制度。所有在华外国人都将获得工作许可证，所有申请都将由当地的外国专家局进行评估推进。

两种许可证合二为一

根据新政策，外国人就业证和外国专家证已经合并为外国人工作许可证。持有效外国人就业证和外国专家证的外国人可以尽快改为外国人工作许可证。商会欢迎这一精简行政手续的政策，因为它有助于简化外国人在华工作流程。

外籍人士分类

根据新政策，在中国工作的外国人将分为 A、B、C 三类：

A 类：“高端人才”，包括科学家、技术专家、国际企业家和其他专家。

B 类：符合特定评分标准的外国专业人士，年龄不满 60 岁，拥有学士及以上学位，具有两年相关工作经验。如有必要，可放宽特定要求。

C 类：从事临时、季节性、非技术性或服务相关工作的外国员工。

中国鼓励 A 类外国人在华工作，此类人士不受人数限制。而 B 类外国人的数量配额受市场需求的限制，C 类外国人受未指定配额的限制。

以分数为标准的评估系统

新政策根据分数评估外国签证申请人。根据申请人教育背景、年龄、工作经验、赞助单位提供的薪水、普通话水平、在华工作地点等对申请人进行评分。

地方当局可酌情制定特殊标准，根据当地需求吸引外国人才。为此，合格申请人可获得加分。总分低于 60 分的申请人被划分为 C 类，60 分及以上属于 B 类，85 分以上属于 A 类。

各个类别的申请要求

商会担心这些规定会限制美资公司为企业配置工作人员的能力。

foreign workers are subject to quotas which have yet to be specified in certain locations.

Score-Based Assessment

Pursuant to the new policy, foreign applicants are subject to a score-based assessment. Applicants are assigned scores based on their educational background, age, work experience, salary provided by the sponsor, Mandarin proficiency, working location in China, as well as other factors.

Local authorities may at their own discretion set particular criteria to solicit foreign talents based on local demands, and extra points may be awarded to candidates with especially relevant qualifications or skills. Applicants with a total score below 60 fall into Category C, those with 60 and above into Category B, and those with 85 and above into Category A.

Application Requirements for Each Category

AmCham China is concerned that these provisions will restrict the ability of US-invested companies to staff their businesses. Category A foreign workers, or “high-level talent,” will be provided with a “green channel,” meaning:

- There are no limitations on individuals’ age in most locations.
- Requirements for work experience and level of education can be relaxed in most locations, and notarization of diplomas may not be required.
- In most locations, the employer may guarantee that the individual has a clean criminal record in lieu of providing a certificate of non-criminal conviction from the individual’s home government.
- In some cities, an individual present in China with a valid visa may apply for a work permit onshore instead of having to apply offshore, and may then convert the visa to a China residence permit directly.
- The timeline of the Notification Letter for Work Permit and Work Permit applications will be shorter than the current process.

Category B foreign workers, or “professional personnel,” must meet the following requirements in order to be eligible for a China work permit:

- The individual needs to possess a Bachelor’s or higher degree and at least two years of relevant work experience.
- The Notification Letter for Work Permit or Work Permit applications must be accompanied by an official degree certificate and non-criminal record legalized by the Chinese Embassy or Consulate in the country where the document is issued.

Category C foreign workers are subject to a quota: further information has yet to be published by SAFEA.

AmCham China is concerned that these provisions will restrict the ability of US-invested companies to staff their businesses. A major area of concern among the American business community is the stated ceiling on eligibility for a Category B visa for those over the age of 60 (although high scores on other criteria may result in an exception). In the US, there is no mandatory retirement age although eligibility for full Social Security benefits is reached at age 66, which is common in other countries as well. Our recommendation is that as long as a professional individual is legally employed and compliant with relevant tax and related regulations, there should be no age restriction or limit.

Moreover, requirements for work permit applicants to submit notarized and authenticated copies of documents create unnecessary administrative burdens for both applicants and diplomatic staff. We urge labor authorities nationwide to provide applicants the option of submitting original documents instead of notarized and authenticated copies of documents, in order to reduce administrative burdens and accelerate the hiring of foreign talent in China.

We further urge transparency regarding the national and local criteria for the score-based assessment system. AmCham China urges the Chinese government to ensure that otherwise qualified individuals are not prevented from working in China because of overly rigid requirements in the assessment system and unsupported work permit quotas for different categories of foreign talent.

Online Application System

AmCham China welcomes the new SAFEA online application system, which is intended to clarify and homogenize work permit policy and processing timelines across the country. Companies may now create online accounts and then submit foreign employee applications through the online system.

Applicants will be able to download forms and submit them electronically. A permanent code will be assigned to each applicant so that individual applications can be tracked. The modified application procedure is intended to reduce the amount of required documentation and processing time for applicants.

Five-Year Residence Permit Pilot Program

A five-year residence permit program has been initiated in Shanghai and is available to foreigners who have worked in China for at least two consecutive years, provided their employer sponsors the application. AmCham China welcomes this program, as it will reduce the administrative burden on the relevant authorities and help attract more global talent to China. We urge the Ministry of Public Security (MPS) to expand the five-year residence permit to a nationwide pilot as soon as possible.

A 类外国人（“高端人才”）可获得“绿色通道”，即：

- 大部门地区不受个人年龄的限制；
- 大多数地区可以放宽对工作经验和教育水平的要求，也不需要对外凭进行公证；
- 多数地区需雇主承诺担保申请人没有犯罪记录，无需申请人所在国政府出具的无犯罪记录纸质件；
- 在一些城市，持有效签证的在中国的外国人可以在境内申请工作许可，而不必在境外申请，然后将有效中国签证直接转换为中国居留许可；
- 外国人工作许可通知函和工作许可的申请时间短于当前流程。

B 类外国人（“专业人员”）必须符合以下要求方可获得中国工作许可证：

- 拥有学士或以上学位，拥有至少两年相关工作经验；
- 申请工作许可证或工作许可申请的通知函必须提交正式学位证书和中国驻该国大使馆或领事馆签发的无犯罪记录证明。

C 类外国人受配额限制——详细信息尚待外专局发布。

商会担心这些规定将限制美资公司为企业配置工作人员的能力。美国商界最关心的一个问题是，对 60 岁以上人士限制申请 B 类签证（尽管在其他标准方面获得高分的话可能会有所例外）。美国没有强制性的退休年龄，但是在 66 岁时有资格享受完整社会保障福利，这在其他国家也很常见。我们的建议是，只要专业人士合法就业并符合相关税收及其他相关规定，就不应限制年龄。

此外，要求工作许可申请人提交经过公证和认证的文件副本，也为申请人和外交人员带来了不必要的行政负担。我们敦促国家相关劳动管理部门允许申请人提供原件而非经过公证和认证的文件副本，以减少行政负担，加快招聘流程，为中国提供必要的外国人才。

商会进一步促请国家和地方当局提高分数评估系统的透明度。商会也促请中国为不同类别的外国人才确定工作许可配额，制定分数评估制度要求，以避免符合要求的外国人无法在华工作。

在线申请系统

商会欢迎国家外专局采用新的在线申请系统，该系统旨在统一全国工作许可政策与受理时间，并提高透明度。现在，公司可以创建在线帐户，在线提交外国员工申请。

申请人可以通过互联网下载表格，并以电子方式提交申请表。系统为每份申请人分配永久代码，可用于跟踪该申请人的情况。修改后的申请程序旨在减少申请需要的文件数量和受理时间。

五年居留许可试点计划

五年居留许可计划已经在上海开始推行，允许连续两年在中国工作的外国人申请五年居留许可证，前提是雇主为该申请提供资助。商会欢迎这个方案，以减轻政府的行政负担，帮助中国吸引全球人才。因此，我们敦促公安部尽快扩大全国五年居留许可证试点工作。

永久居留

为支持将上海建设成为全球科技创新中心，继续推动北京的创新发 展，公安部颁布了新的移民政策法规。新政策明确了申请人获得永久居留权的标准。

根据北京的新规定，在雇主持支持下，满足以下标准的人士将有资格获得永久居留权：

- 申请人在北京连续工作四年以上，每年在中国居住至少六个月；
- 申请人每年取得的工资总额至少为 50 万人民币，且缴纳税款超过 10 万人民币（此标准可以每年调整）。

根据上海的新规定，在雇主持支持下，满足以下标准的人士将有资格获得永久居留权：

- 申请人在上海连续工作四年以上，每年在中国居住至少六个月；
- 申请人每年取得的工资总额至少为 60 万人民币，且缴纳税款超过 12 万人民币（此标准可以每年调整）。

简化后的临时居留许可申请程序

北京、上海、深圳和广州都适用简化的申请程序（也称为“逆流”）。已取得工作许可通知的外国人，如在以上四个城市中的任意城市已持有有效的中国签证 / 居留许可中，可在取得工作许可前申请临时居留许可。临时居留许可有效期北京和广州为 3 个月，深圳 6 个月，上海近 1 年。

Permanent Residence

The MPS has issued new immigration policies and regulations to support efforts to establish Shanghai as a global science and innovation center, and sustain the development of innovation in Beijing. The new policies clarify the standards for obtaining permanent residence in these two cities.

Under the new regulation for Beijing, individuals who meet the following criteria will be eligible for permanent residence, providing they are sponsored by their employers:

- The individual has worked in Beijing for four or more consecutive years and resided in China for at least six months in each of those years.
- The individual earns a gross salary of at least RMB 500,000 and pays tax of more than RMB 100,000 each year (these thresholds may be adjusted annually).

Under the new regulation for Shanghai, individuals who meet the following criteria will be eligible for permanent residence, providing they are sponsored by their employers:

- The individual has worked in Shanghai for more than four or more consecutive years and resided in China for at least six months in each of those years.
- The individual earns a gross salary of at least RMB 600,000 and pays tax of more than RMB 120,000 each year (these thresholds may be adjusted annually).

Simplified Temporary Residence Permit Application Procedures

A simplified application process (also known as an “inverse process”) is available in Beijing, Shanghai, Shenzhen and Guangzhou. Foreigners who have obtained a Notification Letter of Work Permit may apply for a temporary residence permit before obtaining the work permit, if they are already in any of these four cities with a valid Chinese visa/residence permit. The temporary residence permit is valid for 3 months in Beijing and Guangzhou, 6 months in Shenzhen, and almost one year in Shanghai. Foreigners are required to renew their residence permit before the expiration date.

E-Channel at Ports of Entry

The Automated Passenger Clearance System, or “E-Channel,” allows entry to China through an automated station that shortens queuing time for entering mainland China. Under this new measure, permanent residents and foreigners who hold a long-term residence permit in China (6 months or longer) can use the e-channel at the border. Registration is required at the airport before the individual is able to use e-channel. Introduction of the e-channel for resident foreigners was permitted based on AmCham China’s request two years ago, and we sincerely thank the relevant authorities for their foresight in implementing this proce-

dure. This measure has simplified entry and exit for long-term foreign residents of China making international trips and reduced the workload of immigration staff.

Ongoing Regulatory Challenges: Chinese Visas

Start Date of Working in China for International Assignees

Under the current rules, foreign employees need to obtain both a work permit and residence permit before they officially start working in China. After the nationwide implementation of the new work permit application policy in April 2017, applications for these two permits can take around 5 weeks from the time foreign candidates enter mainland China with their work visa (Z visa). However, foreign candidates cannot work until both permits are approved.

However, international assignees will most likely wish to continue working during this interim period. Once they have left their previous role in another country and entered China on a work visa, it is unrealistic for them to be expected to spend more than one month in China without working.

In response to this situation, AmCham China recommends that authorities make a distinction between locally hired foreign employees and international assignees in policy and in practice. Foreign assignees who have obtained a Notification Letter for Work Permit should be allowed to start working for the host entity in China upon entering the country on a Z visa or M business visa.

Older Workers and New Graduates

Work authorization applications submitted by foreign nationals nearing or above the official employment age (i.e., men over 60 and women over 55 years of age) are sometimes subject to longer processing times. They may be required to provide additional documentation, and ultimately be denied work permits because of their age. Although category A applications are not affected by age-limitation regulations, applicants in categories B and C are still subject to age restrictions. Many of these older applicants hold critical skills and relevant experience needed by companies. According to the OECD, the average retirement age among 34 major countries is 65, and moving towards 67. It is therefore recommended that the age limitation be lifted for category B applicants at least, as long as a professional individual is legally employed and compliant with relevant tax and related regulations.

Recent graduates also face difficulty in obtaining work authorization, as they often lack the required two years’ worth of work experience. This requirement not only limits an employer’s ability to hire young foreign talent, it also creates disincentives for prospective foreign students to study Chinese language because it limits their post-grad-

外国人需要在有效期前更新其居留许可。

入境港电子通道

自动乘客清关系统，也称为“电子通道”，允许乘客通过自动化工作站入境中国，从而缩短进入中国大陆的排队时间。根据这项新措施，在中国持有长期居留许可的永久居民和外国人（有效期6个月及以上）可以在边境使用电子通道。用户需要在机场注册，获批后即可使用电子通道。商会欢迎这项措施，帮助长期居住在中国的外国人更方便地进行国际旅行，简化了进出程序。根据商会在两年前提出的请求，允许为外国居民推出电子通道，商会衷心感谢有关当局在实施这一程序方面的远见卓识。这一措施帮助长期居住在中国的外国人更方便地进行国际旅行，并减轻了移民工作人员的工作量。

现存监管问题：中国签证

外国员工在中国工作的起始日期

根据现行规定，外国雇员在正式开始在华工作之前，需要获得工作许可和居留许可。2017年4月全国实施新的工作许可申请政策后，在申请人持工作签证（Z签证）进入中国大陆后申请该两项许可需要约5周的时间。然而，获得批准之前外国员工都不能工作。

但是，在这段过渡时期内，外国人可能希望继续工作。一旦他们离开自己国家的工作岗位，并持工作签证进入中国，在中国待大概一个多月而不工作对他们来说不现实。

为应对这种情况，商会建议当局在政策制定和执行政策时对在当地雇用的外国雇员和外国员工进行区分。应批准已取得工作许可通知的外国员工，持Z签证或M商务签证进入中国境内后就可以开始工作。

“超龄”员工和新毕业生

临近或超过中国官方退休年龄（即男性超过60岁，女性超过55岁）的外国公民申请工作许可时往往要面临更长的受理时间，提交更多的材料，最终还可能因为年龄而被拒绝。尽管中国放宽了对A类申请人的年龄要求，但B类和C类申请人仍面临年龄限制。很多年龄较大的申请人往往掌握着企业所需要的重要技能和丰富经验。我们建议至少应放宽对B类申请人的年龄限制。根据经合组织的数据，34个主要国家的平均退休年龄为65岁，并逐渐趋向67岁。

因此，建议至少应放宽对B类申请人的年龄限制，只要专业人员合法就业并符合相关的税收和相关规定。

新毕业的大学生在申请工作许可方面也面临困境，因为他们普遍缺少所要求的两年相关工作经验。这一要求不仅限制了雇主雇用外国雇员的能力，也挫伤了外国学生学习中文的积极性，因为这条规定限制了外国学生毕业后在中国的就业前景。根据人力资源和社会保障部、外交部和教育部于2017年1月联合发布的《关于允许优秀外籍高校毕业生在华就业有关事项的通知》（第3号通知），如符合特定标准，在国内大学或国外知名大学获得硕士及以上学历的毕业留学生，在毕业后一年内申请工作许可时可以不受两年以上工作经验要求的限制。第3号通知并没有说明“知名”外国大学的定义。我们建议中国政府将此类机遇扩展至具有出色技能和能力的持学士或以上学历的国内和国外大学毕业生，这将会使雇佣企业大大受益。

影响企业的一个相关方面是由于签证要求而无法聘用短期实习生。为有前途的学生/应届毕业生提供长达6个月的有偿或无薪实习是一种常见的企业做法。我们建议改革对这些人员的规定，以使本地要求与国际惯例接轨。

居留许可签发时间

中国不同城市居住许可的处理时间从5个工作日到15个工作日不等。北京2015年将签发时间从15个工作日缩短到10个工作日，然后又减少到7个工作日办结。由于Z签证的初始文件要求很高，所以很难理解为什么处理时间要比过去长得多，过去只需要很少的附加信息。其次，由于申请人的护照原件在整个过程中是由公安局保管，这给申请人的旅行和其他活动带来困难，商会鼓励在全国范围内将处理时间缩短至5个工作日，这是目前天津的做法。

外籍员工合同提前终止后其家属的居留许可

在中国现行的规定下，外籍员工在中国终止合同后需要在10个日历日内注销其工作许可和居住证。这也适用于其配偶和家属持有的居留许可。外国雇员提前终止在中国的工作，但是其家庭成员可能因个人原因需要留在中国，例如，孩子需要完成学期教育；照顾抚养孩子等。国际学校要求16岁以下的学生由成人陪同才能获得学生签证。如果陪同的成人是外国人，他/她的中国居住证有效期必须至少一年。在这一框架下，如果不能保留配偶和孩子的居住证，那么孩子将需要终止他/她在学校一学期的学业，离开中国。

uation employment prospects in the country. The “Notice on Allowing Outstanding Foreign Graduates to Work in China” (Circular No. 3) in January 2017, jointly issued by the Ministry of Human Resources and Social Security, Ministry of Foreign Affairs, and Ministry of Education, allows waiver of the requirement for two years of relevant postgraduate work experience for international graduates holding at least a master’s degrees from domestic universities or from well-known foreign universities when they apply for a work permit within one year after graduation, if certain other criteria are met. However, Circular No. 3 does not define “well-known” foreign universities.

We recommend that the Chinese government relax the policy to include recent graduates with a bachelor’s degree or above from domestic and overseas universities, if said graduates have outstanding skills or talent which would significantly benefit the hiring companies and business.

A related area which affects business is the inability to hire interns on a short-term basis due to visa requirements. It is a common corporate practice to provide paid or unpaid internships to promising students/recent graduates for a period of up to 6 months. We recommend that regulations regarding such persons be reformed in order to bring local requirements more in line with global practices.

Residence Permit Processing Time

The processing period for residence permits ranges from 5 to 15 business days in different cities in China. In Beijing, the period was shortened from 15 business days to 10 business days in 2015, and then further reduced to 7 business days for cancellation applications. As the initial documentation requirements for Z visas are high, it is difficult to understand why processing times are so long compared to the past, when little additional information has been required. Secondly, given that an applicant’s original passport is held by the Public Security Bureau (PSB) during the entire process which makes travel and other activities quite difficult, AmCham China encourages a nationwide reduction of processing times to five business days, as is the current practice in Tianjin.

Dependent Residence Permit after Early Termination of Foreign Employee’s Contract

Under current rules in China, the termination of employment for a foreign employee in China necessitates the cancellation of his/her work permit and residence permit within 10 calendar days. This also applies to the residence permits held by spouses and dependents. Under circumstances where the foreign employee terminates his/her work in China earlier than expected, family members may need to stay in China for personal reasons, e.g., to complete the current school term and care for such dependent child. International schools require students under 16 years old to be accompanied by an adult, in order to sponsor their student visas. If the accompanying adult is a foreigner, his/her China residence permit needs to

be valid for at least one year. Under this framework a dependent would need to terminate his/her studies in the middle of a school term and leave China, if the spouse and dependent residence permits cannot be retained.

AmCham China recommends that in such circumstances the PSB should allow the family members’ dependent residence permits to remain valid until their original expiration dates, if the individuals submit an additional application outlining reasons for the need to stay longer in China.

Certificates of No Criminal Conviction for Foreigners Who Have Resided in China

China should facilitate the process for foreigners who have resided in China for work or other purposes to subsequently apply for a Chinese certificate of no criminal conviction (CNCC). These are needed for procedures such as background checks for employment or immigration to other countries including the US, Canada, Australia, and New Zealand.

In some major cities, such as Beijing and Shanghai, the process to apply for a CNCC can be fairly straightforward. However, in many cities, there are no publicly available rules for how to apply for a CNCC, and the process can be onerous. For example, authorities in cities such as Chengdu require that the individual apply in person, meaning an agent with the power of attorney cannot be used. In other cities, such as Shenzhen, the process may require the applicant to mail in their original passport (creating a risk of loss), a fingerprint card, and authenticated supporting documentation, which are expensive and time-consuming to obtain. In other cities, if the foreigner has not kept the documents showing temporary residence registration at the local police station, it is not possible to obtain a CNCC. In many cities, local authorities are unaware of any policies regarding CNCCs.

AmCham China recommends the publication of a ministry-level, nationwide regulation to streamline the application process for CNCCs. A photocopy of the foreign national’s passport and his/her Chinese residence permit should constitute sufficient supporting documentation for a CNCC application. Foreigners should not be required to apply for a CNCC in person, to send their original passport to China, to authenticate supporting documents, or to present their old temporary residence registration documents issued by the local police station.

Recent Developments: US Visas

Controlling Non-Immigrant Visa Appointment Waiting Times in China

AmCham China was disappointed that on June 21, 2017, President Trump amended executive order 13597, rescinding a key provision intended to speed up visa interview waiting times for non-immigrant visa applicants in China. These

商会建议，在这种情况下，如果个人提交额外申请，说明需要在中国停留更长时间的理由，那么公安局应该允许家庭成员的家属居留许可保持有效至原始到期日期。

在华居住的外国人无犯罪记录证明

对于因工作或其他目的而在中国居住的外国人，如因就业或移民而前往美国、加拿大、澳大利亚或新西兰等国家时，为通过背景调查，可能需要中国提供无犯罪记录证明（CNCC），而这一过程需要优化。

在北京和上海等主要城市，申请无犯罪记录证明的过程相对简单，但许多其他城市并没有申请无犯罪记录证明的公开程序，而且申请手续可能相当复杂。例如，成都等城市要求申请人本人返回中国申请，不能通过持有委托书的代理人办理。深圳等其他城市可能会要求申请者邮寄他们的护照原件（有造成损失的风险）、指纹卡和认证证明文件，昂贵且耗时。在其他城市，如果外国人没有保存在当地派出所办理临时住宿登记的文件，就无法取得无犯罪记录证明。在许多城市，地方当局往往不知道任何有关无犯罪记录证明的相关政策。

商会建议制定全国性部级规定，以简化无犯罪记录证明的申请程序。申请人提供中国居留证和外国护照复印件，即可充分支持无犯罪记录申请。不应要求当事人返回中国申请无犯罪记录证明，发送护照原件到中国，认证证明文件，或出示由当地警察局发放的临时居留许可证原件。

最新进展：美国签证

控制中国非移民签证预约等待时间

2017 年 6 月 21 日美国总统特朗普修改了行政令 13597，商会对此感到失望。此次修改取消了一项关键条款，该条款旨在加快中国非移民签证申请人的签证面谈等候时间。其中包括前往美国出差或游玩的游客、学生和其他临时访客。该条款指示美国国务院和国土安全部确保在当地资源和安全考虑允许的范围内，组织 80% 的非移民签证申请人在收到申请的三周内进行面试。

与中国有商业合作的美国公司需要客户、合作伙伴和海外员工及时出差。商会 2013 年《白皮书》对 2012 年的行政命令表示欢迎，并解释到：

“在截至 2010 年的 10 年里，美国国际旅客支出市场份额的占比从 17% 降至 11%，美国在全球市场的份

额下降了 30% 以上。原因之一是美国签证系统负担过重，签证处理能力不足。2010 年，等待签证的时间超过了 100 天；2011 年，等待时间超过 70 天。美国无法借势中国日益繁荣的签证需求。但国务院实施措施，执行 EO13597 令，取得了巨大进展，包括在中国招聘 50 名新领事官员，减少签证办理时间……”。

特朗普总统的修正案要求国务卿和国土安全部长带头修订 EO13597 的执行方案。商会请求该计划能帮助美国驻华大使馆和领事馆继续缩短非移民签证申请人等待时间。商会主张，该计划应包括尽快在武汉开设美国驻武汉领事馆，进行非移民签证面试，并在中国增设至少 4 个签证点。备选地点可能包括有 200 多万城市居民却没有美国领事馆的城市，比如重庆、大连和深圳。

国际企业家规则

美国公民和移民服务局发布了有关国际企业家人入境的最终规则，该规定原定于 2017 年 7 月生效。然而，特朗普政府推迟了该规则的实施，并已开始努力撤销该规定。

“入境证”允许符合要求的企业家在没有签证的情况下进入美国初创公司工作。此类初创企业必须在过去 5 年内成立，并具备快速增长和创造就业的潜力。此类初创公司必须在过去的 1 年半里获得美国投资者的最低投资，或政府奖励或津贴。鉴于企业家缺乏签证选择，美国移民局的规则是刺激经济增长和创造就业的明智政策。我们强烈要求保留这项规定。

签证更新电子系统申请人提交社交媒体的信息

签证更新电子系统（EVUS）是一个要求外国公民在前往美国之前必须向美国海关和边境保护局更新签证信息的在线平台。目前，EVUS 仅适用于持中国护照上含有效期 10 年的 B-1/B-2 签证身份申请赴美的人士。

2017 年 2 月，美国海关和边境保护局发出通知，要求 EVUS 注册用户确认使用的社交媒体平台及其账号（如：网名）。美国海关和边境保护局公告称，EVUS 社交媒体问题将被标注为“可选”。然而，不透露这些信息可能会被拒绝入境。此外，美国海关和边境保护局可能会在没有任何可疑情况下，不告知设备持有人去搜寻或保留一个电子设备，或复制加密后的数据以便之后搜索。

另一个令人担忧的问题是，美国海关和边境保护局没有解释该机构使用被调查者社交媒体信息的范围。一个人的社交媒体活动不仅显示了账户持有人的信息，还有他 /

applicants include visitors traveling to the US for business or pleasure, students, and other temporary visitors. That provision had directed the US Departments of State and Homeland Security to ensure that 80 percent of non-immigrant visa applicants are interviewed within three weeks of the date their applications are received, to the extent permitted by local resources and security considerations.

US companies doing business with China depend on timely visits from customers, partners, and employees from abroad. AmCham China's 2013 *White Paper* applauded the 2012 executive order, explaining:

"During the decade ending in 2010, the US market share of spending by international travelers fell from 17 percent to 11 percent, a more than 30 percent decrease in the US share of the global market. Among the reasons for the slide were a burdensome US visa system and lack of visa processing capacity. [Waits for visa appointments had at times exceeded 100 days in 2010 and 70 days in 2011.] The US was unable to take advantage of booming US visa demand by Chinese. But measures put in place by the State Department to implement EO 13597 have made impressive strides, including hiring 50 new consular officials in China [and] decreasing visa processing times."

President Trump's amendment requires the Secretaries of State and Homeland Security to take the lead in revising the implementation plan for EO 13597. AmCham China requests that the plan address how the US Mission in China can continue to provide short waiting times for appointments for non-immigrant visa applicants. AmCham China advocates that the plan include opening the US Consulate in Wuhan for non-immigrant visa interviews as soon as possible, as well as adding at least four additional visa-issuing locations in China. Potential locations might include cities with over two million urban inhabitants and no US Consulate, such as Chongqing, Dalian, and Shenzhen.

International Entrepreneur Rule

The US Citizenship and Immigration Services (USCIS) issued a final rule on parole for international entrepreneurs, which was set to become effective in July 2017. However, the Trump administration has delayed the implementation of the rule and has begun efforts to rescind it.

"Parole" would allow qualifying entrepreneurs to enter the US and work at startups without visas. Such startups must have been created within the last five years and have the potential for rapid growth and job creation. The startups must also have received certain minimum investments from US investors, or government awards or grants, within the past 1.5 years. Given the lack of visa options for entrepreneurs, the USCIS rule is a shrewd policy for spurring economic growth and job creation. We urge that the rule not be rescinded.

Subjecting EVUS Registrants to Questions about Social Media Use

The Electronic Visa Update System (EVUS) is an online platform through which certain foreign nationals must provide visa information updates to the US Customs and Border Protection (CBP) in advance of their travel to the US. Currently, the EVUS applies only to persons seeking admission to the US on the basis of a 10-year B-1/B-2 visa in a Chinese passport.

In February 2017, the CBP issued a notice regarding its intent to ask EVUS enrollees to identify the social media platforms they use and their identifiers (i.e., handles). The CBP notice states that the EVUS social media question will be labeled as "optional." However, refusal to disclose this information may result in a person being denied admission to the country. Further, the CBP may search or retain an electronic device, or copy encrypted data for later search without any cause for suspicion and without notifying the owner.

An additional concern is that the CBP does not explain the scope of how the agency will use a respondent's social media information. An individual's social media activity not only reveals information about the account holder, but also about people in his/her social networks, including family members, friends, and "followers." It is possible that the CBP could subject those persons to invasive scrutiny and exposure without consent. The CBP could even probe a traveler based on messages in their social media account left by third parties, who may be completely unknown to the individual, without the traveler's knowledge or consent. CBP rules place no limit on the period of time that the agency may store social media identifiers and subject their posts to scrutiny.

The CBP's proposed EVUS social media questions are likely to have a negative impact on US businesses, including AmCham China member companies. For US businesses in the travel and tourism industries, Chinese visitors constitute a critical market. To the extent that many Chinese citizens perceive the CBP's proposed social media questions as an invasion of personal privacy, the rule creates a disincentive to travel to the US. AmCham China member companies in other industries will also be negatively impacted, as the CBP's proposed social media questions make it more difficult for such companies to persuade employees, partners, and customers to undertake business-related travel to the US.

Further, US requests for social media identifiers will almost certainly lead to similar requests from other countries, as many countries grant visas or visa waivers on a reciprocal basis. Many US citizens may perceive requests for social media identifiers from other countries' immigration authorities as an invasion of personal privacy and a breach of their freedom of expression.

她的社交信息，包括家庭成员、朋友和“粉丝”。美国海关和边境保护局可能会在未经同意的情况下，对出行人进行侵入性检查并泄露信息。美国海关和边境保护局甚至可以在出行人未知或者未同意的情况下，通过可能本人都不知道的第三方社交媒体账户来调查出行者的信息。美国海关和边境保护局没有限制该机构可能存储申请人社交媒体账号并审查其发布信息的时间周期。

美国海关和边境保护局提出的 EVUS 社交媒体问题可能会对美国企业产生负面影响，包括商会会员企业。对于美国出行和旅游行业的企业来说，中国游客是其重要市场。许多中国公民认为，美国海关和边境保护局提出的社交媒体问题侵犯了个人隐私，这一规定挫伤了前往美国的积极性。商会在其他行业的成员企业也将受到负面影响，因为美国海关和边境保护局提出的社交媒体问题使得此类公司更难说服员工、合作伙伴和客户到美国出差。

此外，美国对社交媒体账号的要求几乎肯定会影响其他国家提出类似要求，因为许多国家是在互惠的基础上发放签证或签证豁免。许多美国公民可能会把来自其他国家移民当局的社交媒体账号要求视为侵犯个人隐私，并侵犯他们的言论自由。

现存监管问题：美国签证

商会重申我们对 2017 年《白皮书》的关注和建议：

- 消除按国别分配工作绿卡的歧视性政策；
- 需要使 DS-160 非移民签证网上申请表更人性化。

与美国签证相关的其他监管问题包括以下内容：

年度 H-1B 签证限制不足

多项研究显示，H-1B 项目给美国企业和工人增加就业机会和工资水平有积极影响。例如，全美制造商协会的一份报告显示美国需要高技能的移民，有 82% 的美国制造商很难寻找到具备合适技能的员工。此外，美国商会针对美国公司雇用的科学、技术、工程或数学专业的外国学生报告表明，每名 H-1B 员工能够为美国员工创造 2.62 个工作岗位。H-1B 员工的乘数效应是来自他们对公司的贡献以及他们作为消费者的作用。⁹ 此类 H-1B 员工必须按照在地理区域内特定职业的现行工资进行支付。此外，申请费也为美国职工的科学、技术、工程和数学教育提供了重要资金。

美国国会每年批准 H-1B 签证的数量受到限制，不能满足美国公司雇用外国专业人员的需求。H-1B 签证为临时工作签证，发放给为美国雇主工作的专业人员，这些专业人员的工资最低为现行工资。在过去 14 个财年里，每年 8.5 万份签证的年度上限已经用尽。2017 财年，仅在开放签证的第一周，美国公民和移民服务局收到了超过 23.6 万份 H-1B 签证申请；而在 2018 财年的第一个星期，收到了 19.9 万份申请。还要随机抽取来确定通过审查者，这给美国企业的招聘过程带来了不可预测性。尽管这种不公平的过程并非有意为之，但随着时间的推移，这一流程按照全球流动性标准已过时，需要重新审视和适应现代环境。不应该允许公司使用 H-1B 系统来降低劳动力成本。

国会立法增加限制将使美国公司获得顶级人才，同时也促进竞争，提高生产力。另一方面，H-1B 签证上限过低，或者特朗普政府“买美国货，雇用美国人”的计划挫伤了 H-1B 签证的申请人，这会将技术员工推向竞争国家，美国雇主因此会转而考虑将工作交给驻外员工。

永久居民在国外就职面临的障碍

美国移民法禁止美国公司招聘有意在美国境外就职的绿卡持有人。

如果绿卡持有人连续居留国外一年，期间不曾返回美国，则该持有人将无法再次进入美国。不过，希望在美国公司驻外就职的绿卡持有人可以申请在国外逗留最长两年后再次入境的许可证。然而，目前的美国公民及移民服务局程序要求申请人必须在美国居住，不仅要在美国提交申请，而且要在一到两个月后进行生物特征识别验证。这些程序对需要返回美国进行预约的申请人增加了不必要的费用。美国公民和移民服务局的国外办事处已经在开展具有不同用途的生物识别验证。我们敦促美国公民和移民服务局在不需要说明例外情况的情况下，允许再入境许可申请人在其国外办公室（包括北京和广州办事处）接受生物特征识别验证。

在北京建立全球入境登记中心

商会及其会员强烈建议在北京设立全球入境登记中心。由于中美航班抵达时间和 / 或无法安排与旅行时间表相匹配的面试，在抵达美国后无法进行面试。新加坡全球入境登记中心是亚洲唯一可进行申请的地点，目前面试等待时间为 9 个月。鉴于美国公民在华人数众多，有必要在北京增加另一个全球入境登记中心。

Ongoing Regulatory Challenges: US Visas

AmCham China reiterates our concerns and recommendations from the 2017 White Paper regarding:

- Discriminatory per-country caps on employment-based green cards should be eliminated.
- There is a need to make the online Form DS-160 and Nonimmigrant Visa Application more user friendly.

Additional ongoing regulatory challenges related to US visas include the following.

Inadequate Annual H-1B Visa Cap

Multiple studies have shown the positive impacts on job creation and wage levels that the H-1B program gives to US businesses and workers. For example, a report by the National Association of Manufacturers indicated a need for skilled immigrant workers after it found that 82 percent of US manufacturers reported difficulties in finding workers with the right skills. Additionally, a report by the US Chamber of Commerce on foreign students hired by US companies with degrees in science, technology, engineering, or mathematics showed that each H-1B employee creates 2.62 additional jobs for US workers. The multiplier effect comes from H-1B workers' contributions to their companies and their role as consumers. In addition, filing fees are deposited into a significant fund set aside for the STEM education of US workers.

The number of H-1B visas permitted annually by Congress is subject to a cap that fails to meet demand by US companies that hire foreign professionals. The annual cap of 85,000 visas has been exhausted in each of the past 14 fiscal years. In the first week that such visas became available for FY 2017, USCIS received more than 236,000 H-1B petitions, and for the first week of FY 2018, it received 199,000 petitions. Winners were selected through a random lottery, creating unpredictability for American companies' hiring processes. Although not intended to be an unfair process, over time it has become dated by global mobility standards and needs to be reviewed and adapted to modern circumstances. Companies should not be allowed to use the H-1B system to lower labor costs.

Congressional legislation increasing the cap would give US companies access to the best talent, spurring competitiveness and productivity. On the other hand, adopting an H-1B cap that is too low or disincentivizing H-1B hires through the Trump Administration's "Buy American, Hire American" initiative, drives skilled workers to competitor nations and encourages US employers to consider shifting projects to workers abroad.

Barriers to Permanent Residents Taking Assignments Abroad

US immigration laws inhibit American companies from recruiting green card holders who wish to take assignments outside the US.

A green card becomes invalid for re-entry to the US if the holder remains abroad continuously for one year without returning. However, a green card holder who wishes to take an assignment for a US company abroad may apply for a re-entry permit valid for an overseas stay lasting up to two years. Unfortunately, current USCIS procedures require that the applicant be present in the US not only to file the application but also to appear at a biometrics appointment one to two months later. These procedures impose an undue expense on applicants who need to return to the US for the appointment. USCIS offices abroad already conduct biometrics appointments for various purposes. We urge the USCIS to allow re-entry permit applicants to have their biometrics taken at USCIS offices abroad, including those in Beijing and Guangzhou, without need to prove extenuating circumstances.

Need for a Global Entry Enrollment Center in Beijing

AmCham China and its membership strongly suggest that a Global Entry Enrollment Center be established in Beijing. Interviewing upon arrival in the USA does not work in practice due to China-US flight arrival times, and/or the inability to schedule interviews that match travel schedules. At the Global Entry Center in Singapore, the only location in Asia where an application can be made, wait times for an interview currently stand at 9 months. Given the large number of US citizens in China, it would make sense to add another center in Beijing.

Recommendations

For the Chinese Government:

- Consider accepting original documents instead of notarized ones for work authorization applications in special conditions.
- Visa age limits are an issue for companies. We recommend that if a professional individual is legally employed and compliant with relevant tax and related regulations, there should be no age restriction or limit in regard to their visa status, as is the case in most places in the world.
- Allow international assignees who have entered China on a Z visa or M business visa to start business activities during the processing period for the work permit and residence permit, if a Notification Letter has been obtained.

建 议

对中国政府：

- 考虑在特殊情况下，允许申请工作许可时提交原件而非提供经过公证和认证的原件副本。
- 签证年龄限制是公司面临的一个问题。我们建议，像世界上大多数地方一样，如果专业人士合法就业并遵守相关税收和相关法规，则其签证身份应该没有年龄限制。允许以 Z 签证和 M 商务签到达中国的已经获得工作许可通知的申请人在办理工作许可和居留许可过程中工作。
- 除 A 类申请人外，至少取消对 B 类申请人申请中国工作许可的年龄限制，取消具有学士或以上学位的、具有出色技能和才能的申请人的工作经验限制。
- 在全国范围内允许将公安部门受理居留许可申请时保留申请人护照时间缩短至五个工作日。
- 如果外国员工（主要申请人）由于中国合同提前终止而注销工作许可和居留许可，允许其家属因合理原因保持居留许可至其原定有效期。
- 考虑对实习政策进行检视。

对美国政府：

- 国会应取消国别分配工作绿卡的歧视性制度。
- 国会应审查现行的 H-1B 和绿卡政策，以使其更符合现代全球企业流动性要求。
- 国会应提高专业人员 H-1B 零时工作签证年度上限。
- 国务卿和国土安全部长应带头修改 EO13597 的执行计划。商会要求该计划帮助美国驻华大使馆和领事馆在中国继续缩短非移民签证申请人等待时间。该计划应包括尽快在武汉开设美国驻武汉领事馆进行非移民签证面试，并在中国增设至少 4 个签证点。
- 特朗普政府应为 H-4 员工配偶保留国际企业家规则和就业授权。

- EVUS 注册不应要求旅客向美国公布其社交平台和使用名称。
- 国务院应重新设计 S-160 非移民在线签证申请表，便于申请人查看中文问题，在检查期间及填写完毕后打印或保存中文版问题。
- 美国公民及移民服务局应减少对永久居民外派工作的障碍，允许回美申请者在美公民和移民服务局的国际办公室安排生物识别指纹录入。
- 在北京建立全球入境登记中心。

- Consider eliminating age restrictions in applications for work authorization from category B applicants in line with category A applicants, and eliminating work experience requirements for applicants with a bachelor's degree or above, if they possess outstanding skills or talent.
- Shorten the holding time for passports by the local PSB to five working days nationwide during the processing of residence permits.
- Allow family members to retain their residence permits until expiration upon reasonable grounds, if the foreign employee (principal applicant) cancels his/her work permit and residence permit due to early termination of employment in China.
- Consider a review of internship policies.

For the US Government:

- **Congress should abolish discriminatory per-country caps on employment-based green cards.**
- Congress should review the current H-1B and Green Card policies to bring them more into line with modern global corporate mobility requirements.
- The Secretaries of State and Homeland Security's implementation plan for EO 13597 should address how the US Mission in China can continue to provide short waiting times for appointments with non-immigrant visa applicants, including opening the Wuhan Consulate for non-immigrant visa interviews and adding at least four additional visa-issuing locations in China.
- The State Department should redesign the online Form DS-160 Nonimmigrant Visa Application by making it easier to read the questions in Chinese, as well allowing applicants to print or save the questions in Chinese at the review stage and once the form is finalized. Further, CBP's EVUS registration process should not ask travelers to the US to disclose the social media platforms and handles they use.
- USCIS should reduce barriers to permanent residents taking assignments abroad with US companies by allowing re-entry permit applicants to schedule biometrics appointments at USCIS offices abroad.
- Establish a Global Entry Enrollment Center in Beijing.



This publication can be downloaded at www.amchamchina.org/policy-advocacy/white-paper

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