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How You Can Get Your Game Into China, The Long Answer

2020.5.6 [Other News](#) by [Luke](#)

The Chinese gaming industry has had a very interesting history compared to what you would see in Japan, Europe, or the USA. Though Cocos has only been a part of the industry for almost ten years, the last ten has probably been the most hectic, rewarding, and challenging time in China's video game history.

One of the reasons has been the laws that were built towards video games in China. At times, it's been there to keep people away from the harms of gaming like mature subject matter, gambling, and game addiction. But at times, its frustrated developers, as some requests and requirements required in a game, have frustrated people wanting to enter the Chinese industry, making it seem impossible.

Most of this goes back to the requirement of a game to have a Chinese ISBN that was put in place back when the GAPP (General Administration of Press and Publication of the People's Republic of China) took over online games back in 2001. As online games became more prevalent, more rules have been applied to other types of games to make sure they follow good harmony with Chinese culture, making requirements more stringent. Today, with the merging of many entertainment groups that led to the merging of the SAPPRFT (State Administration of Press, Publication, Radio, Film, and Television) and the newly built SARFT (State Administration of Radio, Film, and Television), has made just understanding what or even who to talk to bring your game to China into a challenge.

The currently formed NPPA (National Press and Publication Administration) was built in 2018 to place games under the Propaganda Department of the Central Committee and Ministry of Culture and Tourism. Though it has a different name, many of the old rules are still around with this group.

One big thing to know today is that it is practically impossible to get an ISBN without the help of a Chinese publisher. We've asked around, and there isn't any way around it. You will need to find one. Luckily, Cocos knows many, and we're happy to share a few with you by contacting us at any time by emailing us from our website or contacting one of our members on the web.

So, in this article, we're going to assume you have a publisher and are going through the process of getting your game into China. We'll share the basic details of what you would need to know about the process that a Chinese publisher goes through to get you an ISBN. We hope this gives you some confidence in understanding the most difficult process of getting a game in the Chinese market and better prepare yourself in talks with Chinese publishers.

A quick note: Due to the Chinese government's ability to change laws quickly, this is only official as of the date of publication and can change at any time. We are also not a law office. We highly recommend getting a lawyer familiar with Chinese copyright law and business law if you decide to move forward with bringing a game to China.

Basic Requirements

Here are the required items you will need to get an ISBN for your game:

1. Must be registered as an online game publisher
2. The game must be copyrighted with the national copyright administration in China
3. The game operator agency must have a Telecommunication and Information Services Business License (ICP Certificate)
4. The game must conform to the laws and regulations of the NPPA in regards to “Publisher Management Regulations,” “Internet Information Service Management Measures,” “Network Publishing Service Management Regulations,” and other laws and regulations.
5. The game must comply with state regulations on protecting minors and game operation activities.
6. The game must go through the NPPA qualification process and be accepted for your game to receive an ISBN.

Let's go through each step and understand the processes required.

Registered As An Online Game Publisher

As of today, there is no way for a foreign company or joint-venture company to have an online game publishing permit. It's also challenging to know exactly all the requirements needed for a publisher due to provincial government requirements. Still, we will share a bit of the process. First you need to get a business license. For example, in Shenzhen (a large game development city,) you will need to fill out the following items with their local industry and commerce group:

1. A company name that includes the words “Technology Co., Ltd.”
2. The business scope of the company is “computer hardware and software, network equipment planning and development, and buying and selling”
3. A copy of their Chinese identity card of each of the legal shareholders
4. Registration of the business address
5. Confirmation of the capital, legal persons, shareholders, and contribution ratio
6. Bank U-Shield (A digital signature device or certificate that verifies it is you), needed for paying the fees for the business license.
7. Have assets of over 1 million RMB or more

Companies that provide this to the local government will receive the following items:

1. An original business license
2. A copy of the business license
3. An Enterprise Unified Social Credit Code certificate (An 18-digit code specific to that company)
4. Articles of Association
5. Company Seals and Seal retention card (All legal documents require seals in China)

There may be a request for additional licenses for the distribution of games, depending on the location of the company. One such license in Shenzhen is a “Network Cultural Business License” for the distribution of items on the internet. This is done through the regional department with approval from the Ministry of Culture or denial with an explanation in 20 working days. This license is valid for three years.

The Game Has A Copyright

Since it's your game, the company in China that publishes your game must be allowed to use your copyright in China. All foreign copyright owners must receive copyright from the National Copyright Administration (NCAC).

If you would like to read more about how to do this, here is an excellent document on the entire process.

https://www.china-iprhelpdesk.eu/sites/china-hd/files/public/v8_How_to_Register_Copyright.pdf

I'll just briefly share some of the most essential items.

All computer software is required to go through the Copyright Protection Centre of China (CPCC) as authorized by the NCAC. You can submit copyright by going to the offices of the CPCC or by mail.

You will need the following items:

1. The application form that can be found at the CPCC headquarters in Beijing or their website

2. Identification for the applicant. A photocopied and translated passport of the applicant and the original legalized and notarized version of the incorporation document that has the company name, incorporation date, location, certificate number, and validity.
3. Joint development contract
4. Power of attorney if an agent is used
5. Sample of the work. Minimum of 30 pages of the source program unless the program is under 60 pages, then all should be submitted. This is both for the server and client code.
6. Certifications of the inheritance acquirement or receiving of the copyright, if not the original owner.

Once the documents are received and the fee of 200RMB per game and 120RMB per 100 pages of code, you will receive your copyright in 30 working days.

Have A Commercial ICP Certificate

The ICP Certificate allows a company in China to be an internet content provider. This also allows a company to host a website and do e-commerce in the country. It's a necessary item as all data going through most games require a server in the country, and therefore you need the certificate. Though you might not need the ICP certificate for your game to enter China, your publisher is required to have one.

Only Chinese owned, and joint business with Chinese ownership owning over 51% of the company can apply for an ICP Certification. The company also must have 1 million RMB in registered capital to apply. The company must also have a server for their website or game located in the country.

ICP licenses are issued through the Chinese Ministry of Industry and Information Technology (MIIT).

To receive a certificate, the company must do the following:

1. Have a Chinese business license
2. An account with a Chinese ISP like Alibaba, Baidu, and others
3. A domain name in China
4. Server in China

Gaining an account with a Chinese ISP does require a few added items:

- ISP service number (provided when you signup with the ISP)
- Domain name
- Province and district you are registering from
- ID number of the leader and website administrator
- Copy of the business license
- Chinese phone number (both landline and mobile)
- Photo of your passport
- Type of ICP you are filing for
- Details about your business

For more information on this, Alibaba has a great list of items it requires. (<https://partners-intl.aliyun.com/help/doc-detail/36890.htm>)

Once you have all the items, all of them must be sent to the provincial office where the company's business license was issued.

An added issue is as a video game publisher, it must be pre-approved before allowing the license to be issued. The pre-approval from either the Administration of Press and Publication of the province (for companies in Sichuan and Hubei provinces) or the Press Bureau of Publicity Department of the CPC Central Committee.

Your website must now show both your companies business license and the ICP certificate on the front page. Most companies will add it at the bottom of the page.

Conform to the Laws of the NPPA

Now that you have all the business side complete from the first three requirements, it's now all about what is going on in your game.

The NPPA is very strict about how media (including but not limited to games, books, movies, TV, shows etc.) is shared inside the country. This is to help the Chinese governments in their need to keep harmony among their people and that the media provided to them keeps in harmony with the people. There are three rules that you must be aware of and make sure your game is following at all times.

Publisher Regulations

Games must follow the established order of the Chinese government and their ideals for the country, making sure they benefit society. Companies building games in China must have capital of over 300,000rmb and a fixed location in the country that follows city, provincial, and national laws.

No work can have the following items:

1. Infringe on the copyright of others
2. Have opposing opinions on the Constitution of The People's Republic of China
3. Endanger national unity, sovereignty, and territorial integrity
4. Leak state secrets that harm national security, honor, or interests
5. Entice ethnic hatred, discrimination, endanger ethnic unity, or infringe on ethnic customs or habits
6. Promote cults and superstitions
7. Disturb social order or destroy social stability
8. Promote obscenity, gambling, violence, or glorify crime
9. Insults or slanders others or infringes on their legal rights and interests
10. Endanger social morality or national cultural traditions
11. Infringe on state regulations

Items that are targeted towards minors may not have the game imitate behaviors that violate social morality or commit crimes. They also must not include scenes of terror, cruelty, or content that impairs the physical and mental health of a child.

Games made in China can be sold overseas with the approval of the publication administration department of their jurisdiction in China. Games sold in China must be sold by companies with authorized publication business licenses

The Chinese government supports and encourages games that support the following:

1. Explains or promotes the Chinese constitution
2. Carry out patriotism, collectivism, socialism, and national unity education and promote socialist core values
3. Promotes the national culture and promote international cultural exchange
4. Contributes to promoting cultural innovation and new scientific and cultural achievements at home and abroad.
5. Helps to serve agricultural, rural areas and farmers and public cultural services.
6. Share important ideological value, scientific value, or cultural and artistic value.

Those who do this will be rewarded for their contributions (Not sure if monetary rewards, but have seen paper awards given by the government to companies for doing a good job.)

Any company that illegally distributes games without a business license or an illegal business license will receive fines comparable to the amount made from the sales of the game. Most fines for games that made over 10,000 RMB will be 5 to 10 times the amount made, and all physical retail games will be confiscated.

A publishing company may lose its license by doing one of the following

- Changes name, business scope, merges or separates without registering the change to the government
- Fails to publish an annual publish plan describing their actions of the past year concerning national security and social stability
- Fails to send samples of games for review
- Fails to keep a sample copy for review when requested for one
- Suspends publishing games for more than 180 days without authorization
- The quality of the publisher does not meet regulation standards

Publishers do have the opportunity to receive a new license. But, they must apply as if it's a new company after one year. If they violate the rules, the party may lose its qualification for a business certificate as well.

Provisions on the Administration of Online Publishing Services

Some of the requirements here are the same as above with a few added items to recognize:

Any game that is published in China must have relevant servers and storage devices that are located in the territory of the People's Republic of China.

All legal representatives and main people in charge of the publisher must be permanent residents of China, and NPPA must approve at least eight people with at least three members being required to have intermediate or higher professional qualifications.

A content review system must be set up by the publisher for NPPA to review at any time.

Any joint-venture with a foreign company for an online service, it must be approved by NPPA. The NPPA will send approval or disapproval notice in no less than 60 days after accepting the application and give reasons as to why there is disapproval in their report.

To be able to publish online games, your company must have an Online Publishing Service License. To get one, the following items need to provide to your regional government:

1. Application form for Online Publishing Service License
2. The articles of association and the certification of the source of capital.
3. The feasibility analysis report of online publishing services, including fund use, product planning, technical conditions, equipment allocation, institutional settings, staffing, and city.
4. Resume, address, and ID of the legal representative and principal person in charge.
5. State-recognized professional qualification certificates and major professional experience and training certificates of editing and publishing-related professional technical personnel
6. Workplace use certificate
7. Website registration certificate and the servers located in the People's Republic of China

The process should only take ten days to receive, and your license will be sent to the main offices of the NPPA. The license is valid for only five years and can be renewed. If the company suspends their license, they must share with their regional government, including the reasons and terminate service in 30 days. Failure to have online services for over 180 days, can have it's licensed canceled.

All approved online gaming services must have their license number on the homepage of their website. (Most place at the bottom of their site). Companies can only engage in what they define as the scope of their work that they shared in their license. They cannot lend, rent, sell, or transfer their license.

Annually, companies with an Online Publishing Service License must submit a form to the NPPA with the following:

1. Implementation of policies and laws
2. Status of rewards and punishments from the government
3. Websites published that year
4. Current management of the company
5. Operational performance
6. The current catalog of games
7. Any rectification of the laws and regulations for the year
8. Training certification of editing and publishing staff (Certificate is given to individuals who train with the NPPA)

This must be sent to both the NPPA and any provincial government that you are under with the name. You will get a certified letter stating you are approved with a government seal. The time limit to send this is dependent on the jurisdiction of your province or region.

Any material that violates the rules of set in the publisher's regulations may be given a warning notice, reported criticism, and an order to correct their games, an open review of the game, or an order to delete the game by the NPPA. Other actions towards the publisher itself may take place as well, including suspending the business. The business can also be suspended for not following the rules found in the Provisions on the Administration of Online Publishing Services, and professional and technical personnel can have their qualifications revoked.

Internet Information Service Management Measures

Commercial Internet services in China are divided into two groups, operational and non-operational. Operational being websites that require payment for access, and non-operational as those free to the public. All commercial websites need a license to operate.

All sites must comply with the “Telecommunication Regulations of the People’s Republic of China,” and companies must have a business development plan and a sound network that has security safeguards, information security, and secrecy management. This license must be applied to the local relevant authority.

Any company that creates a site and wants to add a forum or electronic bulletin board service must get approval and a license to do so. All information from this service must be stored, including IP address, username, phone number of the user, and more. These shall be held for no less than 60 days.

Companies using a forum or electronic bulletin board service must abide by the same rules as specified in the publisher regulations.

Any company not following these regulations and break it more than three times and less than five times, a fine may be imposed with the possibility of the site closure after the fifth violation. Failing to file all paperwork in an appropriate time or violating the law can automatically have your site closed, license revoked, or a fine imposed.

Regulations for protecting minors

Though these changes from province to province, we can share a general idea of what the Chinese government is requesting for the protection of minors. But please check with your publisher if you need a more detailed account. Most would rather have you share the game and let their internally trained reviewers in their company take care of this.

Though there are national regulations that implemented in 2019 that are required and can be viewed from the [government website](#). This includes monthly purchase limits, time for gaming, and real-name registration.

Some restricted games in China include the following items: harem infighting, political maneuvering, poker or board games, dress up games, blood in any color, corpses that don’t disappear immediately, superstition or fortune-telling, and allowing marriage for minors. Loot boxes are also required to show accurate odds and may require limits on how many boxes can be opened in one day.

Application for the ISBN

Now that you have all the information you need. Your publisher (who is registered to publish games in China) can start to fill in the paperwork. There are ten items they’ll need to send to NPPA for your ISBN. This includes:

1. An introduction letter that has a front page, marked document numbers, signature and a company seal that contains the game’s name, the publisher name, operator name, the content matter of the game, first commercial launch date, initial territories released, current territories are operating in, the number of users, revenue, the social response to the game and the game platform. The game name must only be in Chinese (no Arabic numerals) and not vulgar. Two copies should be sent on A4 Paper.
2. Your “Authorized by the overseas copyright owner for Internet Game Works” application form available from the NPPA website (<http://www.sappprft.gov.cn/sappprft/contents/7063/293282.shtml>)
3. A copy of your Business license and ICP certificate stamped and with the official seal of the operating agency. If the operator is not the same as the publisher, you must share a copy of the contract between the two parties with the official seal of the copyright owner
4. A photocopy of your National Copyright Administration’s approval of copyright contract registration
5. Screenshots and detailed descriptions of the game. Screenshots must be in color, and they only need ten or fewer. Must show the core of the content and basic appearance of the game. One picture must be the main interface of the game.
6. Describe the operating mechanism of the game’s anti-addiction system and how it will work.(Currently not needed for mobile, but may be needed in the future)
7. All scripts for the game including system prompts, NPC dialog, mission descriptions, game prop names, and main story script. This can be sent electronically.
8. Online games must share four levels of accounts for addiction testing (Under 8 years old, 8 – 16 years old, 16 – 18 years old, over 18 years old) for testing of the anti-addiction systems. (Not needed for single-player games, but allow three installation activation codes for testing.) A mobile game doesn’t need this step at this time.
9. Three copies of the game on CD, game logins URLs, or a URL to the installation package. If you need special equipment to play the game, two units will need to be shipped to NPPA. They will be returned after the review. No changes can be applied to your game from the version sent to NPPA
10. Three CD’s with all the instruction booklets, box art, and text, and other text materials as well as a 10-minute video of the game demo. The video must include health advice screen, game title, interface, character images, accessible scenes, gameplay, and settings in the combat system, and

the duration of these items (minus gameplay) must be more than 2 minutes. Anti-addiction tips must be shown if it has an anti-addiction system. The CD must be marked with the name of the game in Chinese, and the words 电子文档资料 and 演示视频.

Approvals can come in no more than 80 business days. Due to the new rules from the NPPA, there is more regulation on how many games can be released per month in China, so you may have to wait for approval. Any game that is rejected two (in some locations) or three times for an ISBN will no longer be accepted for application.

Conclusion

Now that you know, you can be more prepared for the issues you might find when you try to work with a Chinese publisher for your game. Though it's a lot of information and pretty lengthy, the more you know about what will disqualify your game or become a problem for your partnership, the better.

If you still have reservations, contact us anytime. We'll help you to find the best partners in China.

Thanks to the help of Jessie and Eric at Cocos, Neo Liu of Xiaomi, Ilya Gutov of MY.GAMES, and Maciej Burno of Aptoide for their support and knowledge in helping us complete this story.

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