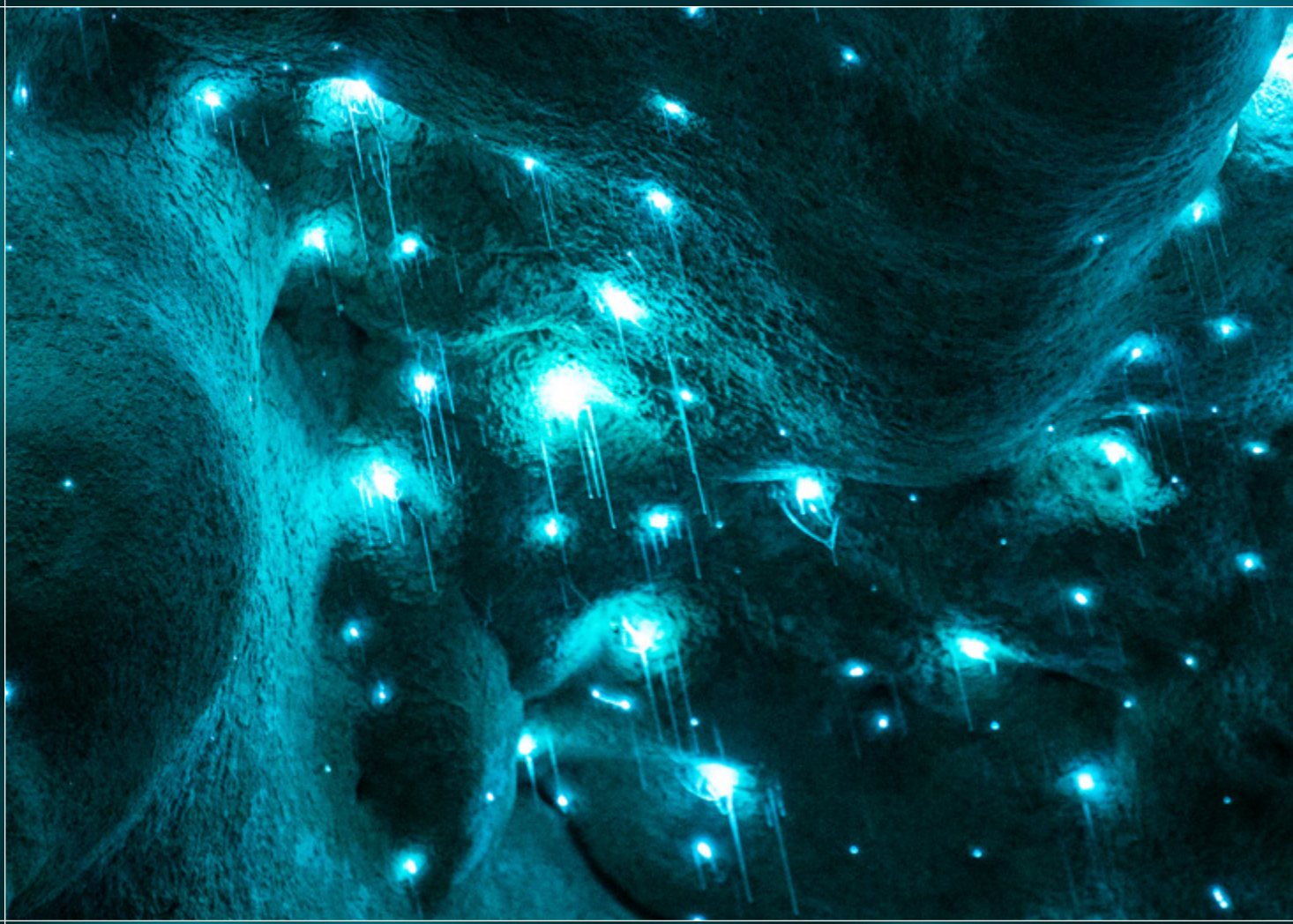
November 2026

Data Centres

APAC Regulatory Guide – **China**

Investment considerations



MALLESONS

Chapter 2

China



A year of... vast capacity growth, selective and enduring strategic-security controls

Population	Data centres	Live capacity	Pipeline capacity
1.41 billion	380	5.60 GW	2.6 GW+
	YoY: 26 (7.3%)	YoY: 131 MW (2.4%)	YoY: -97 MW (-3.6%)

Data centre statistics provided by DC Byte (as at September 2026)

China remains a very significant but tightly regulated market. Strong domestic demand, driven by AI adoption, cloud growth and digital transformation, continues to support large-scale infrastructure investment.

Government policy is a double-edged sword: while regulatory hurdles are high, supportive initiatives like 'East Data, West Computing' and green infrastructure mandates offer clear incentives for aligned operators.

At the same time, operators must navigate complex challenges, including strict data localisation rules, cyber security obligations and foreign investment restrictions.

Escalating US export controls on advanced chips and technologies are adding pressure to high-performance data centre buildouts, particularly for AI and hyperscale workloads.

Opportunities

- Supportive government policy
- Strong domestic demand

Challenges

- Restrictive foreign investment framework
- Comprehensive data localisation rules
- US export controls

Spotlight on key drivers

Navigating data localisation requirements

China enforces some of the world's most rigorous data localisation and cross-border transfer controls.

These rules have compelled many multinational companies, such as Apple, to localise infrastructure, driving demand for compliant, onshore data centres.

Foreign investment restrictions

China maintains strict foreign ownership limits on data centre operations, particularly in relation to VAS.

This includes internet data centres (**IDC**) - defined broadly to capture services including hosting and cloud services.

Foreign investors (excluding qualified Hong Kong and Macao entities under the Closer Economic Partnership Arrangement (**CEPA**)) are generally capped at 50% ownership and face licensing barriers, such as ineligibility for the B11 VAS licence.

Nevertheless, there has been a gradual reduction of foreign equity ratio restrictions for several VAS, including IDCs, since 2024. By June 2026, over 160 enterprises obtained pilot approvals for numerous categories of VAS, including IDCs, internet access, online data processing, transition processing and information services categories.

US export controls

US export restrictions on advanced semiconductors and AI-related technologies limit China's access to critical components from leading US and allied suppliers, affecting build-out timelines for AI and hyperscale infrastructure.

As a result, data centre investors in China must navigate increasing technology sourcing risks and compliance uncertainty, particularly for GPU-intensive applications.

> China's initiative to rapidly expand its data centre infrastructure driven by digitalisation and AI demand, with a strong focus on green energy integration, presents companies with substantial opportunities in energy-efficient solutions.

Susan Ning
Partner, King & Wood



01 Power

Getting power to a site

China's electricity transmission and distribution are dominated by two state-owned utilities: the State Grid Corporation of China and China Southern Power Grid. Securing power for a data centre typically involves four key stages:

1. feasibility study
2. project approval and filing
3. engineering and construction, and
4. grid connection acceptance

Requirements vary based on project size, location and entity type. Whether data centres are classified as commercial or industrial users, or large-scale energy-intensive projects, is determined on a case-by-case basis.

- Residential users have simplified processes (approximately 1-2 months), mainly involving review by the power company.
- For commercial and industrial users, supporting documents such as land use rights and environmental assessments must be submitted, with timelines ranging from 3–6 months.
- Large-scale energy-intensive projects may require multi-level approvals, which can take over a year.
- Projects in remote areas may face longer delays due to weaker grid infrastructure or local policy constraints.
- In designated green pilot zones (areas which comply with national or local renewable energy consumption policies, such as Inner Mongolia and Qinghai), renewable energy projects benefit from streamlined processes.

Power purchase agreements

Large electricity users, including data centres, are permitted to enter into, and are increasingly adopting, direct PPAs with power generation companies. These agreements offer long-term pricing certainty and access to renewable energy.

In 2024, the National Development and Reform Commission and the National Energy Administration issued the Basic Rules for Medium and Long-term Electricity Trading – Special Chapter on Green Electricity Trading, which were further revised in December 2025.

These rules explicitly encourage large electricity users and electricity sales companies to purchase green electricity directly from power generators, further supporting the development of market-based renewable energy procurement.

In addition, a recent notice from the National Development and Reform Commission and the National Energy Administration issued in May 2025 authorises 'direct connection projects'. This means renewable energy generators can connect directly to certain large-scale consumers.

These combined changes may lead to significant shifts in the electricity procured by large electricity users in China and their practical implementation at different levels (national, local and provincial) will be watched closely.

Going 'green'

China's national and local governments strictly regulate data centre energy procurement and usage, emphasising green and low-carbon development. In January 2026, multiple departments including the Ministry of Industry and Information Technology (**MIIT**) issued the Guiding Opinions on Carrying Out Zero-Carbon Factory Construction, which designates computing facilities as a key priority area for zero-carbon factories.

The Special Action Plan for the Green and Low-Carbon Development of Data Centres (**Action Plan**), released in July 2024, set ambitious goals for energy performance.

> By the end of 2025 new data centres in national hub nodes must use over 80% green electricity, and the PUE of new, renovated, or expanded large and hyperscale data centres must fall below 1.25.

The Action Plan promotes the following factors for low-carbon development of data centres:

- optimised data centre layouts
- strict energy and water efficiency for new projects
- retrofit programmes for older facilities
- increased use of renewable energy
- efficient use of land and resources, and
- adoption of energy-saving technology and equipment.

The Action Plan also encourages the participation of data centres in green electricity trading platforms and green certificate markets to increase the share of clean energy in their supply mix. Relevant regions are encouraged to actively explore the development of direct supply of green electricity power supply arrangements, including:

- Inner Mongolia
- Qinghai
- Jiangsu
- Beijing-Tianjin-Hebei
- Yangtze River Delta
- Xinjiang, and
- Jilin.

All government-procured data centres must comply with the Green Data Centre Government Procurement Demand Standards trial (**Green Data Centre Standards**). Key requirements include:

- PUE thresholds: not exceeding 1.3
- renewable energy usage: 100% by 2032, and
- water efficiency: annual water consumption must not exceed 2.5L per kWh of electricity used by IT equipment.

Local spotlights

- *Beijing* will impose different electricity prices on existing data centres based on whether and by how much their PUE values exceed the standard limit value of 1.35 from 2026 onwards under the Beijing's Work Plan for Optimizing Existing Data Centres (2024-2027). The target is to reduce the annual average PUE of the city's existing data centres to 1.35 or below by 2027.
- *Heilongjiang* province requires large-scale newly built data centres to have a PUE below 1.25.
- *Shandong* province is advancing efforts to ensure that newly built large-scale and above data centres maintain a PUE not higher than 1.3, while striving to reduce the measured PUE of all existing large-scale and above projects in the province to below 1.4.

02 Water

Water supply

Water usage by data centres is regulated under the Green Data Centre Standards. The standard caps the water-to-energy ratio at 2.5 litres per kWh of electricity consumed by IT equipment, aiming to improve overall water efficiency in cooling and facility operations.

In 2025, the first national standard (GB/T 32910.6-2025) for data centre WUE was issued which unified the evaluation method for water efficiency. Specifically, for regions where water scarcity is present, use of recycled water is prioritised with the water efficiency indicator remaining at less than or equal to 2.5 L/kWh.

Water conservation policies

In addition to the Green Data Centre Standards, national and local policies, including the Action Plan for Green and Low Carbon Data Centres, encourage (but do not mandate) data centres to adopt water-saving technologies and optimise water use. This includes retrofitting for water efficiency and increasing the use of recycled or reclaimed water for cooling and other non-potable applications, particularly in regions facing water stress.

In October 2025, the MIIT and the Ministry of Water Resources issued the Implementation Plan for the High-Quality Development of Water-Saving Equipment (2025-2030) to address water conservation in digital infrastructure such as:

- data centres
- general-purpose computing power centres
- intelligent computing centres, and
- supercomputing centres.

The notice promotes the adoption of high-efficiency cooling and heat dissipation equipment in digital infrastructure, including liquid cooling, evaporative cooling, heat pipes, and refrigerant pumps, to improve the utilisation rate of natural cooling sources.

03 Land

Permits and approvals

The development of data centres broadly follows general real estate project procedures. Key requirements include obtaining land use rights, project approval and filing, environmental impact assessments, land and engineering planning approvals, construction permits and completion acceptance.

The approval process generally involves two main stages: pre-construction and project acceptance.

- During the pre-construction phase, the key milestone is obtaining the Construction Project Planning Permit, which requires submission of land use rights documents, design proposals and other supporting materials.
- In the construction phase, developers must ensure ongoing compliance with noise pollution laws (including the *Ecological and Environmental Code, the Noise Pollution Prevention and Control Law* and local emission standards) and maintain safe and orderly construction practices to avoid suspensions, rectification orders or delivery delays.

Under the *Ecological and Environmental Code*, which took effect in August 2026, developers must prevent and control construction-based noise pollution. Requirements include:

- budgeting for prevention and control costs
- implementing prevention and control plans, including automated noise monitoring systems
- adopting low-noise construction techniques and equipment in areas with a high concentration of noise-sensitive buildings, and
- the prohibition of nighttime construction.

- The acceptance stage begins with planning compliance verification (as required under Article 45 of the *Urban and Rural Planning Law*) to confirm adherence to approved plans, which is followed by:
  - **Fire Safety Acceptance/Record-filing:** Either mandatory inspection, or record-filing with random checks, overseen by housing and urban-rural development authorities
  - **Environmental Acceptance:** Self-conducted, with public disclosure of monitoring reports and regulatory oversight
  - **Completion Acceptance and Record-filing:** Submission of completion reports, quality warranties, and relevant certificates to the competent authority, and
  - **Land-use Compliance Verification:** Audit of land boundaries and fulfilment of land use contract obligations.

Zoning requirements

Data centre zoning is influenced by factors such as energy availability, climate, infrastructure, environmental risk and national or regional policy.

Under the 'East Data, West Computing' initiative, priority is given to building data centres in national hub nodes of the integrated computing network (for example, in Guizhou, or Inner Mongolia).

Several major cities have issued policies prohibiting new data centre projects in designated zones, such as the central urban areas of Beijing and Shanghai.

New developments in these restricted areas cannot be filed with the local Development and Reform Commission, effectively blocking project approval. Exceptions exist, primarily for government data centres, which may operate in restricted zones (for example, in central Beijing).

Expansive limitations

Expansions, reconstructions or increases in cabinet capacity in existing facilities within restricted zones may still trigger filing requirements. Where a project is in a prohibited area, the likelihood of obtaining approval for such changes is low. Early and proactive engagement with the local Economic and Information Bureau and the Development and Reform Commission is essential, though there is currently no pathway for rezoning.

04 Telecommunications

Applicability of telecommunications laws to data centres

Data centres are regulated under national telecommunications laws and classified as providers of VAS. Two key instruments apply:

- the Administrative Measures for Telecommunications Business Operation Licences set out the conditions, documentation and procedures required to obtain a VAS licence, and
- the Telecommunications Business Classification Catalogue (2019 Edition) classifies IDC services as a Class I VAS business.

Is a telecommunications licence required?

Entities operating IDC services must obtain a Value-Added Telecommunications Business Licence (**B11 licence**), which has been available electronically from the MIIT since October 2025.

Core application requirements include:

- adequate funding, qualified personnel and registered premises
- availability of appropriate facilities and technical infrastructure, and
- a comprehensive information security management plan.

If a data centre operator outsources network equipment maintenance or management to a third party, that party must also hold a valid VAS licence for the relevant activities.

A data centre which is self-built and self-operated, and does not provide services to third parties, does not require a B11 licence.

05 Foreign investment restrictions

Land

Foreign investors cannot own land in China, except for 'self-use' or 'self-residence' purposes in certain limited circumstances. They may otherwise only obtain land use rights through long-term leases.

Data centres

Under the CEPA signed in 2003, IDC and cloud computing services in Mainland China are open to qualified Hong Kong and Macao investors, who may hold a higher equity stake than the 50% cap that generally applies to other foreign investors. To qualify, such Hong Kong and Macao investors must:

- be registered or established in Hong Kong or Macao
- have conducted substantive business operations for at least 3 years, and
- provide a verification certificate from the relevant telecommunications authority confirming the nature and scope of their services.

These investors may apply for the B11 licence (covering IDC and cloud services) under the *Telecommunication Services Classification Catalogue*. The B11 licence remains unavailable to investors from other countries or regions.

As mentioned above, foreign equity ratio restrictions for IDC services have slowly lifted under the VAS Notice with pilot programmes active in four locations - Beijing, Shanghai, Hainan and Shenzhen.

Telecom sector access

Foreign ownership in VAS, including IDCs and cloud computing, is generally limited to 50% and basic telecommunications services must remain Chinese-controlled.

These restrictions are set out in two core legal instruments:

- the Special Administrative Measures for Foreign Investment Access (Negative List) (2024 Edition), applicable nationwide, and
- the Negative List for Pilot Free Trade Zones (2021 Edition), applicable in designated free trade zones.

Certain services, such as e-commerce, call centres, domestic multi-party communications and store-and-forward services, are exempt from the 50% cap.

06 Tax and other incentives

Special economic zones

China has established several special economic zones (**SEZs**), including in Shenzhen, Zhuhai, Shantou, Xiamen, Hainan, Kashgar and Khorgos, to attract foreign investment and support regional development. These SEZs offer preferential policies, such as:

- reduced corporate income tax rates
- tariff exemptions
- flexible land use policies, and
- cross-border capital facilitation.

The Hainan Free Trade Port, for example, applies a zero-tariff policy for certain imported goods and offers a reduced corporate tax rate of 15% for qualified enterprises.

Data centre incentives

Various local and provincial governments in China offer tax incentives, subsidies and grants to data centre operators and developers. These include VAT refunds or exemptions for enterprises engaged in data processing, storage and other eligible IT services.

Additional incentives are available for green and low-carbon initiatives. For example, Heilongjiang province and districts in Shanghai and Guangzhou offer one-off rewards of RMB1 million (approximately US$140,000) to businesses recognised as national green factories, or green supply chain enterprises.

US export controls continue to restrict China's access to advanced AI chips and technologies, with rules evolving rapidly. Despite the US government's decision to rescind the AI diffusion rule, it remains clear that China is the primary target of ongoing restrictions.

In response, China is intensifying investment in domestic AI capabilities, with companies like Huawei making notable progress in AI chip development. This push for technological self-reliance presents both a challenge and an opportunity for other players in the region, as China seeks to close the gap left by restricted foreign access.

07 Data protection and cyber security

Data protection or privacy laws

Under the PIPL, data centre service providers typically act as entrusted personal information processors, assisting clients (referred to as 'personal information handlers') in meeting their data protection obligations.

A data processing agreement is required between the parties, outlining respective roles, responsibilities and liabilities. Where the personal information handler does not directly control security measures, the data centre operator assumes primary responsibility for implementing technical and organisational safeguards.

Obligations include:

- appointing a data security officer and team
- implementing data security policies
- regularly conducting risk assessments, monitoring, emergency drills and training
- vetting key personnel
- managing complaints, and
- reporting data disposal plans in scenarios such as dissolution or bankruptcy.

Cyber security laws

All data centres must comply with China's Multi-Level Protection Scheme (**MLPS**), which classifies IT systems based on their potential security impact on national security, public order, civilians, legal persons, other organisations and public interest in the event of a breach.

- MLPS levels: range from Level 1 (low risk) to Level 5 (critical infrastructure).
- Core obligations include: system registration, risk assessments and implementation of progressively stringent security controls based on classification level.
- Key: technical standards include:
  - Baseline for Classified Protection of Cyber security (GB/T 22239-2019), and
  - Classification Guide for MLPS (GB/T 25070-2019).

Organisations using outsourced or cloud-based services must also ensure MLPS compliance if they build or operate any part of the underlying information systems.

As the MLPS requirements are stipulated in the CSL, failure to comply could result in orders and warnings from the relevant authorities, and fines against the relevant entities and persons directly responsible.

Highly regulated sectors, such as finance, healthcare and natural resources, are subject to industry-specific regulations for operational resilience, governing a data centre's capabilities in data recovery, incident response and business continuity.

As an example, subject to:

- the Guidelines on Business Continuity Supervision for Commercial Banks (CBRC Notice [2011] No. 104), and
- the Guiding Opinions on Strengthening IT System Development and Management for Non-Banking Financial Institutions,

financial institutions must establish a business continuity management system to ensure rapid recovery of critical operations following disruptions, mitigate or eliminate impacts and losses caused by operational interruptions and safeguard sustained business operations.

Financial institutions must also develop both comprehensive emergency plans and operation-specific contingency plans addressing disruption scenarios. Outdated equipment and inadequate risk management measures could result in regulatory penalties.

08 Critical infrastructure and security

Critical infrastructure laws

Data centres in China may be designated as CII operators (**CIIOs**) by the relevant authorities, based on factors such as the type and volume of data hosted, industry served and the impact of potential disruption.

There are no specific data type and quantity thresholds issued for a data centre to be designated as a CIIO. CIIOs are subject to heightened obligations under the CSL, DSL and PIPL. The national standard GB/T 39204-2022 (effective May 2023) outlines criteria for identifying CIIOs and prescribes requirements for security assessments, incident monitoring and emergency response.

National security issues

CIIOs must undergo a cyber security review before procuring any network products or services that may affect national security.

Entities handling 'important data' under the DSL must comply with extensive obligations, which includes data that could endanger national security, economic stability, social order or public health if compromised. Obligations include:

- appointing a data security officer and team
- implementing data security policies, and
- regularly conducting risk assessments, monitoring, emergency drills, and training.

They must also vet key personnel, manage complaints and report data disposal plans in scenarios such as dissolution or bankruptcy.

Physical security issues

Data centres are subject to physical security standards, such as:

- GB 50174-2017 – Code for Design of Data Centres, and
- GB/T 51314-2018 - Operation and Maintenance Standard for Data Centre Infrastructure.

The Code for Design of Data Centres classifies facilities into three security levels based on usage, and societal and economic impact. Additional physical security requirements are set out in the Guidelines for the Implementation of Customer Data Security Protection in Internet Data Centres, covering access control, surveillance, and infrastructure integrity.

While not all standards are mandatory, they are widely recognised and strongly recommended for compliance and risk management.

09 Data localisation

General data localisation requirements

China imposes strict data localisation obligations under the CSL, DSL and PIPL, which outline that:

- CIIOs must store personal data and important data collected within China onshore, unless otherwise specified, and
- cross-border data transfers by CIIOs are only permitted where necessary, do not endanger national security or public interests, and pass a government-led security assessment.

Under PIPL, all data handlers transferring personal data overseas must:

- obtain separate consent from individuals
- conduct a Personal Information Protection Impact Assessment, and
- disclose the purpose, scope and recipient of the transfer.

These rules have led many multinationals (for example, Apple) to host Chinese users' data in local data centres. The regulatory environment continues to drive domestic data centre investment and expansion.

Cross-border data transfer filing requirements and exemptions for data originated outside of China

China regulates cross-border data transfers through a framework built on the CSL, DSL and PIPL. The key compliance mechanisms are:

- a mandatory security assessment (for transfers involving CIIOs, important data, or large-scale personal information)
- the filing of standard contracts for personal information outbound transfers
- a personal information protection certification.

In March 2024, the Cyberspace Administration of China issued the *Provisions on Promoting and Regulating Cross-Border Data Flows*, which streamlined the regime and introduced various exemptions for security assessments, standard contract filing and certification.

Notably, pure data transit is explicitly exempt from these requirements. According to the official guidelines, data that merely passes through China, where it is only routed via domestic infrastructure without involving personal information or important data within China, does not constitute a data export. As a result, these transit scenarios do not require a security assessment, standard contract filing or certification, significantly easing compliance for global routing operations that do not interact with local data.

ON THE GROUND

Targeted or indirect data localisation requirements

Several industries in China are subject to sector-specific data localisation mandates, even if not expressly labelled as such. These include:

- **Human genetic resources:** Export or access by foreign parties requires prior approval and record-filing with the Ministry of Science and Technology
- **Online ride-hailing:** Operators must store personal and business data within Mainland China for at least 2 years, and cannot transfer it overseas without approval (Interim Measures for the Management of Online Ride-Hailing Services)
- **Internet mapping services:** Map data servers must be located within China (Regulations on the Management of Maps), and
- **Online publishing:** Technical infrastructure (servers, storage devices) must be deployed onshore (Administrative Provisions on Online Publishing Services).

10 Environmental, social and governance

International ESG commitments

China was among the earliest signatories and ratifiers of the Paris Agreement (22 April 2016) and continues to reaffirm its climate commitments through international forums such as COP29.

These commitments have been translated into a broad legal and regulatory framework supporting the country's green transition. Key instruments include:

- the *Ecological and Environmental Code*, adopted in March 2026, which systematically integrates environmental laws and administrative regulations to fully implement the carbon neutrality commitments under the Paris Agreement
- the *Interim Regulations on the Administration of Carbon Emissions Trading* (in force since 2024), which establish the legal foundation for China's national carbon market
- the *Energy Law of the People's Republic of China* (adopted in November 2024), which aims to promote high-quality energy development, safeguard national energy security, and support the country's low-carbon transformation, and
- complementary regulations, such as the Water Conservation Regulations, Ecological Protection and Compensation Regulations, and Measures for the Administration of Pollutant Discharge Permits, further strengthen China's capacity to regulate environmental impacts across sectors.

ESG laws and standards

China's green transition is driving a growing set of ESG-related laws and technical standards relevant to data centres, including:

- the *Energy Conservation Act* and *Renewable Energy Act* providing the foundation for energy efficiency and clean energy integration across industrial operations. While not specific to data centres, it requires high energy users to establish internal energy management policies. Authorities may also supervise and inspect energy usage; and
- the Data Centre Energy Efficiency Limits and Energy Efficiency Grades (**GB standard**) establishes mandatory thresholds and grading criteria for energy consumption in data centres.

Policy drivers and spatial planning

China's 'East Data, West Computing' initiative is a core ESG-linked strategy that shifts the construction of large-scale data centres toward western provinces of China. This aims to alleviate pressure on water and energy resources in densely populated eastern cities while making better use of renewable-rich regions inland.

In 2022, the National Development and Reform Commission started construction of national computing hub nodes in 8 regions:

- Beijing Tianjin-Hebei
- Yangtze River Delta
- Guangdong Hong Kong-Macao Greater Bay Area
- Chengdu Chongqing
- Inner Mongolia
- Guizhou
- Gansu, and
- Ningxia

along with 10 national data centre clusters.

The initiative has already delivered notable success, significantly improving the spatial balance of computing resources between eastern and western regions of China.

According to the white paper issued towards the end of 2025, China's Actions toward Carbon Peaking and Carbon Neutrality, efforts will be made to:

- promote the green and low-carbon development of data centres
- coordinate the construction of large-scale wind and photovoltaic power bases with national data hub nodes, and
- increase the proportion of green electricity used in data centres in China.



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