日本貿易振興機構（ジェトロ）

中国、ACFTA 3.0 を通じ ASEAN における立場を強化

China Strengthens ASEAN Position Through ACFTA 3.0 Upgrade

【要約】

2025 年 10 月 28 日、ASEAN と中国は「ASEAN 中国自由貿易協定（ACFTA）3.0 アップグレード」に署名した。これは 2010 年の協定発効以来、最も包括的な現代化である。新協定では、サプライチェーンの連結性、デジタル経済、グリーン経済、競争・消費者保護、中小企業の 5 つの新章が追加された。

具体的には、税関手続きの透明性向上や英語文書の義務化、国際基準への整合が図られる。サプライチェーン分野では、危機時における重要物品の貿易維持メカニズムが構築される。デジタル経済章では、人工知能（AI）やデータ流通、電子決済での協力が規定された。グリーン経済章では、太陽光パネルや電気自動車等の環境物品の関税削減や関連サービスの障壁緩和を行う。さらに、オンライン消費者保護や競争政策の相談メカニズムも新設された。

中国は ASEAN 最大の貿易相手国であり、2024 年の貿易額は 9,820 億ドルに達している。本協定は各国の批准を経て、2026 年後半から 2027 年初頭の発効が見込まれている。

Title: China Strengthens ASEAN Position Through ACFTA 3.0 Upgrade

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Overview

On 28 October 2025, ASEAN member states and China signed the Third Protocol to Amend the ASEAN-China Free Trade Agreement (**ACFTA 3.0 Upgrade**), marking the most comprehensive modernization since ACFTA's establishment in 2010. The upgrade introduces five new chapters addressing **supply chain connectivity**, **digital economy**, **green economy**, **competition/consumer protection**, and **MSMEs**, alongside substantial enhancements to transparency and customs procedures. ASEAN-China trade has grown fivefold since 2008, reaching USD 982 billion in 2024, with China as ASEAN's largest trading partner and third-largest FDI source at USD 19.3 billion.

The agreement reflects China's strategic positioning amid intensifying economic competition. The Digital Economy chapter complements DEFA by addressing emerging technologies cooperation including artificial intelligence not yet covered in ASEAN's internal framework, while ensuring China benefits from similar commitments on cross-border data flows and digital trade. The Green Economy chapter—first for both ASEAN and China—positions China's dominance in green technology manufacturing to meet ASEAN's renewable energy infrastructure needs. Enhanced transparency provisions target barriers Chinese agricultural exports face, while new competition and consumer protection rules address ASEAN concerns about Chinese import competition.

Japanese companies face competitive challenges as Chinese manufacturers benefit from streamlined customs, reduced barriers, and preferential treatment. However, Japanese companies can leverage ACFTA 3.0 through their ASEAN and Chinese operations. ACFTA governs ASEAN-China bilateral trade, distinct from intra-ASEAN trade covered by ATIGA. Manufacturers with ASEAN facilities can export to China using ACFTA preferences, while companies with China operations can access ASEAN markets preferentially. Companies with operations in both regions can optimize triangular supply chains. Major Japanese corporations should evaluate how ACFTA provisions enable cost optimization across China-ASEAN operations.

Details and Analysis

Transparency and Customs. Enhanced transparency in health, safety, and product regulations serves China's interest in expanding agricultural and fresh produce exports. Requirements for English documentation, shorter timelines, and international standards alignment reduce time-to-market for Chinese products. Japanese agricultural exporters face intensified competition, but Japanese food manufacturers with ASEAN operations can leverage improved customs when exporting to China under ACFTA. Emphasize quality and safety in premium segments while utilizing ACFTA preferences for ASEAN-manufactured products entering Chinese markets.

Supply Chain Connectivity. The chapter establishes mechanisms for maintaining essential goods trade during disruptions, institutionalizing ASEAN-China supply chain integration. For Japanese companies, this creates triangular opportunities—Japanese manufacturers can source Chinese components into ASEAN production, then export finished products to China under ACFTA. Japanese manufacturers can also optimize component flows bidirectionally. While this complicates "China Plus One" narratives, it enables Japanese companies to leverage cost-efficient Chinese inputs for ASEAN manufacturing destined for Chinese markets (ACFTA) or regional markets (ATIGA). Map China-ASEAN operations identifying optimization opportunities, distinguishing China-bound exports utilizing ACFTA from intra-ASEAN flows utilizing ATIGA.

Digital Economy. The Digital Economy chapter complements DEFA by addressing both issues not yet covered in ASEAN's internal digital framework and overlapping areas ensuring China benefits from ASEAN's digital integration. On emerging technologies, cooperation focuses on artificial intelligence where China, the second biggest state actor in the field, emphasizes expanding AI utilization across diverse applications. ASEAN countries find this utilization approach immediately applicable to development needs. Chinese AI companies gain preferential access with regulatory support. Cross-border data provisions mirror DEFA, benefiting Chinese e-commerce and digital services. Japanese IT services providers in ASEAN benefit from facilitated data flows when serving clients with China operations under ACFTA, while DEFA governs intra-ASEAN data flows. Japanese fintech with ASEAN presence can explore China opportunities using ACFTA's electronic payment cooperation. Engage proactively in AI cooperation demonstrating quality, ethics, and reliability advantages while exploring how ASEAN-based digital services access Chinese markets under ACFTA.

Green Economy. The Green Economy chapter establishes frameworks for lower tariffs on environmental goods and reduced barriers for environmental services. China produces over 80% of global solar panels, 60% of wind turbines, and dominates the EV supply chain. ASEAN countries require massive renewable energy infrastructure. The chapter creates pathways for Chinese green technology preferential access. However, Japanese companies with ASEAN green technology manufacturing can leverage ACFTA for China market access. Renewable energy manufacturers with ASEAN operations can export to China under preferential tariffs. Automotive manufacturers producing hybrids/EVs in ASEAN can access China's market using ACFTA. For regional distribution, these products benefit from ATIGA's liberalized rules of origin. Evaluate whether establishing or expanding green technology production in ASEAN enables cost-competitive China access under ACFTA while maintaining Japanese technology and quality.

Competition and Consumer Protection. The chapter reflects ASEAN businesses' concerns about perceived unfair Chinese competition (extremely low prices, dumping allegations, and challenges competing with Chinese e-commerce platforms). Provisions attempt win-win outcomes—ASEAN gains consumer protection while China secures market access improvements. Japanese companies benefit from frameworks when competing against Chinese imports in ASEAN, while ASEAN-manufactured products entering China under ACFTA gain similar protections. Emphasize compliance, quality, and safety as differentiators. MSME chapter creates partnership opportunities with ASEAN MSMEs seeking quality suppliers, where Japanese companies position as alternatives while helping partners access Chinese markets using ACFTA.

Immediate Priority Actions

ACFTA Utilization Assessment (Q1 2026): Companies with ASEAN or China operations should assess utilization opportunities. Map current China-ASEAN trade flows within corporate groups, distinguishing China-bound exports (ACFTA-eligible) from intra-ASEAN flows (ATIGA-governed). Identify products manufactured in ASEAN accessing China under ACFTA preferences, and vice versa. Model tariff savings. Coordinate ACFTA utilization with ATIGA strategies to optimize both China market access and regional integration. Evaluate whether establishing new production enables market access optimization. Engage trade compliance teams on rules of origin and certification for both ACFTA (China trade) and ATIGA (intra-ASEAN trade).

Competitive Response and Positioning (Q1 2026): Evaluate ACFTA 3.0 impacts on market positions in agriculture, green technology, digital services, and consumer products. Model market share impacts and margin pressure. Identify responses—premium repositioning, quality emphasis, local partnerships, or leveraging own operations for preferential treatment when exporting to China.

Triangular Supply Chain Optimization (Starting Now): For companies with both ASEAN and China operations, optimize component sourcing and finished goods flows leveraging ACFTA for China-ASEAN trade and ATIGA for intra-ASEAN trade. High-value add manufacturers should evaluate sourcing strategies balancing Chinese inputs with ASEAN production for both Chinese markets and regional markets. Those companies should map optimal regional flows. Evaluate whether relocating production stages to ASEAN enables China market access under preferential treatment. Assess green technology, machinery, and industrial equipment manufacturing in ASEAN as gateways to Chinese markets. Engage in sector-specific cooperation emphasizing Japanese quality with regional cost competitiveness.

Implementation Timeline and Critical Considerations
Entry into force likely late 2026 or early 2027. Implementation is more uniform than ATIGA/DEFA given China's technical assistance capacity. ACFTA reinforces Chinese structural advantages, which are proximity, cost, BRI infrastructure, and government support. However, Japanese companies with ASEAN and China operations can leverage the agreement for regional optimization. Success requires dual approaches: competing in segments where quality justifies premium positioning, while utilizing ACFTA preferences through regional operations for cost competitiveness when accessing China markets.

Strategic Positioning
ACFTA 3.0 reinforces ASEAN's approach—deep China integration while maintaining partnerships with Japan and others. Japanese strategy should emphasize complementarity:

1. Leverage Japanese technology with Chinese scale through ASEAN platforms accessing Chinese markets under ACFTA when exporting, while coordinating with ATIGA for intra-ASEAN distribution.
2. Emphasize quality with regional cost structures through ASEAN operations.
3. Build triangular supply chains optimizing Chinese inputs, ASEAN manufacturing, and preferential access to both Chinese markets (ACFTA) and regional markets (ATIGA).

Major Japanese corporations with substantial ASEAN presence should prioritize ACFTA utilization. Companies manufacturing in ASEAN explore China export opportunities under ACFTA, companies in China evaluate ASEAN access, companies in both regions map optimal bidirectional flows leveraging ACFTA for China-ASEAN trade and ATIGA for intra-ASEAN distribution. Smaller companies without direct operations explore partnerships with ASEAN manufacturers for indirect ACFTA benefits when targeting China markets.

Prepare for 3-5 year Chinese competition intensification while identifying defensible niches. The question is where and how to compete effectively—leveraging quality, technology, relationships—while utilizing ACFTA through regional operations when accessing China markets and coordinating with ATIGA utilization for regional integration where price sensitivity limits premium positioning.