**Reflections on 中共中央办公厅国务院办公厅关于健全社会信用体系的意见 [Opinions of the General Office of the CPC Central Committee and the General Office of the State Council on Improving the Social Credit System]**

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**1. Introduction**

With 中共中央办公厅国务院办公厅关于健全社会信用体系的意见 [Opinions of the General Office of the CPC Central Committee and the General Office of the State Council on Improving the Social Credit System] (the “Opinions”), a high level organ of the political central authorities delivered, for the first time in over a decade, a major conceptual writing on social credit and its systems (hereafter the SCS”). It was time. The germinal opinion,[[2]](#footnote-2) established both the conceptual basis for a broad understanding of social credit, its relation to the ruling ideology, and its pathways to implementation.[[3]](#footnote-3)

By 2025, and like virtually everything else in Chinese political ideology, SCS required appropriate (socialist) modernization.[[4]](#footnote-4) To understand the “Opinions,” one must understand post 3rd Plenum Socialist Modernization and especially its role, in the first instance, in the further elaboration of a High-Standard Socialist Market economy. It is from this perspective that the reflections that follow are oriented. Section 2 (Deus ex Machina) provides a contextual context. Section 3 then suggests broader themes and trajectories around the core themes of structure:外儒内法;[[5]](#footnote-5) and norms: Trust 信).[[6]](#footnote-6)

**2. Deus ex Machina**

 Chinese Social Credit systems was once a "thing" both in China and in the West.  The reporting and reaction was vast, intense, and ultimately of relatively short duration (my discussion in essays here: [Social Credit](https://lcbackerblog.blogspot.com/search/label/Social%20Credit)). It served as a sort of fetish object into which societies could pour their hopes and fears of what they began to understand as the inevitability of the transformation of social relations in the face of technologically enhanced digitization of social actors and the digitalization of their inter-relations. Not that people had not seen this coming--but it was generally left to science fiction writers in the 1950s-1970s and (mostly French) philosophers (it was Foucault who reminded his audiences that individuals were necessarily going to be reduced to "populations" and "statistics") and thus of little importance other than as markers of pretension or entertainment and both. But starting in the second decade of the 21st century, what was entertainment or pretension became substantially more real as technology (finally) revealed the possibilities for translating theory into operational systems.

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In China it appeared to offer the possibilities of seamless management of people, institutions, and systems. The operational objective was built around trust.[[7]](#footnote-7) For a short time at least, it was allowed to appear to point toward the perfection of a sort of regulatory system of systems. This meta system was to be grounded in big data based algorithmic analytics. These were meant to create (eventually) sets of interlocking and coordinated (through the organs of the CPC administered through state organs) platforms in which large pools of data which were to be shared by institutions across a variety of sub platforms (criminal, consumer, finance, education, judicial, social, labor, administrative, etc.). The object was to consume this data through analytics that were meant to lead to judgments (social credit scores) that would, in turn produce consequences across sub-platforms. Those judgments (scores) and consequences, in turn, were also consumed as data that then contributed to further real time consequences and scoring for its subjects.

Taken together, and at its most ambitious, social credit appeared, at least initially, to harbor the ambition to design a system of systems the object of which was to prod everyone and everything to adjust their behaviors and in so adjusting move closer to the ideal  (the ideal cadre, the ideal worker, the ideal parent, the ideal student, the ideal judge, the ideal enterprise, the ideal official, etc.). The interpretation of that ideal and its fulfillment, then, would become a core objective of the political vanguard through its CPC, one grounded in its application of Marxist Leninist theory with Chinese characteristics in the face of the contemporary general contradiction at any stage in historical development.

In a very real sense, then, one might be excused for thinking at, at least in its beginning and especially before COVID, the ideal of Chinese social credit was to create, *in virtual form*, the complexities of social relations, and then to use the analytics that converted physical to virtual representations of social relations to manage--and modify, various aspects of those relations, behaviors, and the like through targeted interventions.  It was, at its root, the beginning of an effort *to digitize (eventually, and in its most ambitious versions) all of Chinese life and social relations, and then to digitalize these social relations through the construction of what might be understood as the hologram of Chinese life in all its respects*. While similar ambitions were on display outside of China, the core difference was embedded in the difference between Marxist-Leninist and liberal democratic systems.

If the former the effort was meant to be undertaken under the leadership and guidance of the Communist Party of China (CPC), and to enhance the ability of such leadership and guidance to be most effective. It was centralized and  a means of enhancing the ability of the CPC to undertake its basic line.  In liberal democratic states it was driven in and through markets, by private natural and legal persons (and other collectives), in which the state (the vessel containing political authority however expressed) played a regulatory and usually antagonistic role (except to the extent the projects suited state officials of course). It was decentralized, and privatized, and driven by collective transactional interactions. In a sense, *the Marxist-Leninist social credit project could be understood as essentially deductive and the liberal democratic project as inductive,* in the sense that the former constructed social credit as an expression of its principles and objectives (with the State serving as the leading force), while in the later social credit initiatives contributed to the construction of principles and objectives (with the state holding up the rear).

 But that has all changed now; even in China. The experiment has fractured, and the challenge from traditional holders of authority and the pull of traditional ways of managing social relations proved too much for a quick transition. More importantly, the fractious competition among organized officials, each in their own little silos, for control of the key aspects of the system: overwhelmed the ambitions of those who might have thought it possible to develop a comprehensive system for a more or less seamless mass management. At its core, the fundamental state assets worth fighting over were quite important both to the operation of the human centric Marxist-Leninist apparatus, as it could be to the operation of its digitalized version: data, data management and use, coding, coordination, algorithms, punishments and reward, and the like. At its core, then, the “problem” of social credit was its inability to overcome the contradictions inherent in systems of law grounded in exogenous interventions and those of social credit grounded in endogenous and coded biopolitics.

But social credit and its systemicity has not died. Indeed, it has thrived, though after 2016 or so now well tamed within the web of social relations within which it was to serve in a decisive role. Some of it has been peeled away into other, more siloed, and less ambitious endeavors--in the form of smart cities, smart courts, smart finance, etc., and perhaps, after the 3rd Plenum of the 20th CPC Congress's further development of socialist modernization and its high quality production principle, in the form of a "smart" Party apparatus. It makes sense from the perspective of a principles lead system.  One must first develop all of the component parts of a comprehensive system before it might be coordinated into existence through the CPC's coordinating mechanisms. That preserves the structures of power relations even as it shifts its locus from officials an institutions to the algorithms and data that serve them. And one must ensure that all such component systems conform to law--reminding people (and especially senior CPCP leaders) that the ultimate element in the constitution of a comprehensive coordinated system of "smart" governance will have to involve the automation or the digitalization of law and its rule, and thus perhaps, as well to some extent, of the forms in which the CPC's guidance and leadership must take.[[8]](#footnote-8)

**3. Social Credit and a Shared Future for Mankind**

All of these trajectories have found echoes in the 31 March 2025 release of [*中共中央办公厅国务院办公厅关于健全社会信用体系的意见*](http://paper.people.com.cn/rmrb/pc/content/202504/01/content_30065297.html) [Opinions of the General Office of the CPC Central Committee and the General Office of the State Council on Improving the Social Credit System]. The core object remains the same--trust as the organizing object/characteristic that drives system building.[[9]](#footnote-9)  Its scope and methods now reflect a new and perhaps less ambitious reality grounded in its contribution to socialist modernization (社会信用制度是市场经济基础制度 [The social credit system is the basic system of the market economy])--an object that also appears in liberal democratic states[[10]](#footnote-10) in the development of economic relations, broadly construed. At the same time, its detail suggests that social credit remains a foundational method for the management of social relations with ambitions that exceed a narrow construction of markets and economic activity. One speaks here of social credit as the means of digitally managing in innovative ways, both market relations and trust as it basic characteristic.

The document is organized around six opinions: (1) General Requirements [总体要求]; (2) Build a social credit system covering all types of entities [构建覆盖各类主体的社会信用体系]; (3) Consolidate the data foundation of the social credit system [夯实社会信用体系数据基础]; (4) Improve the trustworthiness incentive and dishonesty punishment mechanism [健全守信激励和失信惩戒机制]; (5) Improve the supervision and governance mechanism based on credit [健全以信用为基础的监管和治理机制]; (6) Improve the marketization and socialization level of the social credit system [提高社会信用体系市场化社会化水平]; and (7) Strengthen organization and implementation [加强组织实施]. Let's consider each very briefly.

***3.1 General Requirements [总体要求].***

These situate social credit squarely within the ideological development of Chinese Marxist-Leninism in its New Era, but also specifically as a manifestation of new and high quality productivity at the heart of socialist modernization theory as memorialized in the documents produced in the 3rd Plenum of the 20th CPC Congress in July 2024. Of particular interest perhaps was the reminder to "adhere to the general tone of work of seeking progress while maintaining stability, fully and accurately implement the new development concept, adhere to government guidance, market drive, and social co-construction, adhere to the promotion of integrity culture, adhere to the mutual integration of public credit information and market credit information, adhere to reasonable and legal credit rewards and punishments." The melding of social credit and the important objectives of the creation of a Socialist Rule of Law state are presented here as both form and object.

***3.2 Build a social credit system covering all types of entities [构建覆盖各类主体的社会信用体系].***

This part of the Opinion was divided into five parts: (1) Deepen the construction of Government credit; (2) Strengthen the credit construction of business entities;  (3) Accelerate the credit construction of social organizations; (4) Promote the credit construction of natural persons in an orderly manner; and (5) Comprehensively strengthen the credit construction of the judicial law enforcement system. This section suggests that the ambitions for social credit as outlined in the 2014 State Council paper[[11]](#footnote-11) has not diminished, but that the approach to its realization is now more cautious and more deeply embedded in contemporary patterns and forms of (human centered) governance through law. In some sense it plays to the notion of 外儒内法 (Confucianism on the outside; legalism on the inside) but with Marxist-Leninist characteristics.[[12]](#footnote-12) At the same time, the scope of focus remains economic transaction-oriented even as its reach touches on all critical fields of social relations--governmental (including judicial), enterprises, social organizations, and individuals (in markets at least).  The focus on judicial credit, grounded on trustworthiness, may be worth quoting in full:

Strengthen the construction of judicial credibility of courts and procuratorates and improve judicial credibility. Increase judicial openness in accordance with the law and safeguard the people's right to know. Strengthen the credit construction of judicial law enforcement personnel, and establish a credit record and credit commitment system for law enforcement personnel. Increase the cost of false litigation, illegality and dishonesty. Strictly implement the identification procedures for dishonest persons subject to enforcement, and optimize relevant dishonest punishment measures.[[13]](#footnote-13)

It is only a small step to move from the internal legalism of each of these five parts of this portion of the Opinion to the larger normative framework: government, business entities, social organizations, natural persons, and the judiciary represent the great pillars of Socialist Chinese society. It is to their coordinated and orderly operation that the encoding of perfection, and the legalism of systems of rewards and punishments are directed. But at the level of the Party, those legalisms are merely the instruments of the embedding of normative values that are necessary for socialist perfectionism at each stage of historical development leading (eventually) to the establishment of a communist society in and as China. While the legal state is directed toward the state apparatus and all social collectives,[[14]](#footnote-14) it cannot apply to the vanguard Communist Party, whose own internal structures of legality are subject to its own authority. In this sense the delightful ambiguity appears to serve those constituencies which center legality, as well as those constituencies that favor the coded manifestation of Party core leadership to avoid social “abnormality,” a condition that must be defined and internalized among the great centers of collective life.

***3.3. Consolidate the data foundation of the social credit system [夯实社会信用体系数据基础].***

This part is also divided into five parts: (1) Establish a comprehensive, complete and accurate credit records; (2) Strengthen the collection and sharing of credit information; (3) Establish a unified public disclosure system for public credit information; (4) Promote the open circulation of public credit information in an orderly manner; and (5) Strengthen the security protection of credit information. This is, in large measure, a reaffirmation of the old social credit core. It is effectively impossible to develop a coherent and effective social credit system—an integrated system of punishments and rewards built around the CPC’s elaboration of aspirational perfection—without the basic fuel of that system, that is, of data. To that end the Social credit system must focus not just on data, but its construction in something like useable form, and its warehousing and distribution in ways that are structurally meaningful for access by those organs involved in the production of assessment, and of coordinated systems for the distribution of punishment and reward.

Of critical importance here may be the focus on the coordination of digitized data flows within a central platform overseen by and through State organ(s).

Strengthen the “general hub” function of the national credit information sharing platform for credit information collection and sharing, adhere to sharing as the general principle and non-sharing as the exception, uniformly collect credit information in various fields, provide credit information services to relevant departments according to needs and regulations, and regularly conduct collection and sharing quality and efficiency evaluations.[[15]](#footnote-15)

The 3rd Plenum emphasized the need for coordination, especially in the economic field, including it seems, data and data sharing (which is to be distinguished from the organization and coordination of data platforms through markets, an idea heavily criticized in official discourse). Much of the rest of this section touches on coordination and fulfillment of existing law and regulation. The issue, of course, is coordination where various aspects of law and regulation are vested in different organs of the administrative state apparatus.

***3.4 Improve the trustworthiness incentive and dishonesty punishment mechanism [健全守信激励和失信惩戒机制].***

This section has three subparts: (1) Strengthening incentives for trustworthy behavior, (2) Carrying out dishonesty punishment in accordance with laws and regulations; and (3) Improving the unified credit repair system. The focus, as it has been especially since 2014, remains fixed on notions of trust, trustworthiness and its performance within the larger projects of socialist modernization in economic and then social relations. That object has not changed.  But its expression and coordination with the project of building a rule of law state has modified the means toward its fulfillment, In a sense, one might think about this as a means of disciplining coders and analytics by alignment them more closely with the processes and forms of law. That still leaves open the sometimes vast spaces left to exercises of administrative discretion (to be taken up by generative A.I.?). But still, it represents a means of both coordination among objectives and a form of at least some sort of discipline in the process of moving from digitization, to digitalization of conduct and its consequences.[[16]](#footnote-16)

Of particular interest, perhaps, is the breadth of context in which systems of (lawful) punishments and rewards are to be developed. At its limit it is meant to align the social totality of the social credit system, reaching all aspects of social relations (Opinion 2) with the legalist technologies of implementation. But these are written in the form of instructions to coders. Government officials, and certainly lower level cadres would have very little to say about the substance of this section, with the exception of the small space for discretionary decision input which Opinion 4 largely implies is to become automatic (and those exogenous to the bureaucracy, except for the generation of data and the compliance with rewards and punishments. This last is particularly relevant to the last of the instructions in this Opinion 4: the therapeutic mechanisms for trust/credit repair. Yet this is a task assigned to the National Development Reform Commission. That suggests an initial focus on economic behaviors, but also that the NDRC may house the coders and the analytics necessary for compliance.

***3.5. Improve the supervision and governance mechanism based on credit [健全以信用为基础的监管和治理机制].***

It ought not to be surprising that this section is divided into six subsections: (1) Implement hierarchical and classified supervision based on credit evaluation; (2) Establish and improve the credit commitment system; (3) Promote the in-depth application of credit reports; (4) Strengthen the credit supervision of contract performance such as government signing and guiding the signing of contracts; (5) Promote credit empowerment of grassroots governance; and (6) Improve the laws, regulations and systems of the social credit system.  In a sense here is where the regulatory sausage is prepared. Administrative organs are assigned disciplinary, supervisory, and coordinating tasks. Some of the elements of smart cities are encountered, especially in the context of governmental systems of review and approval of credit based decision making. Perhaps of greater interest in this section is subpart (3):

Promote the in-depth application of credit reports. Promote the full use of credit reports in public management fields such as market access, administrative approval, government procurement, investment promotion, and qualification review. Vigorously promote the use of special credit reports to replace certificates of illegal and irregular records. Encourage the use of credit reports in market transactions such as bidding, financing and credit, and commercial transactions.[[17]](#footnote-17)

 Read narrowly, of course, it suggests maximizing the value of credit reporting within the contours of socialist modernization goals.  Read more broadly, it suggests the greater use of credit scores--that is of the determination of a judgment about the aggregate factors that went into producing that score--on a host of interactions with the state. All of this, of course, is to be undertaken in accordance with law-*-a law that must (in the context of the fundamental dialectics between social credit and law systems) be adapted to social credit objectives* to protect the integrity of both systems. "Promote the promulgation of the Social Credit Construction Law and promote the inclusion of credit rules in relevant special laws and regulations. Strengthen comprehensive evaluation before the promulgation of credit policies to prevent the generalization and abuse of credit management measures." [推动出台社会信用建设法，推动将信用规则纳入相关专项法律法规。加强信用政策出台前的综合评估，防止信用管理措施泛化滥用。].

***3.6 Improve the marketization and socialization level of the social credit system [提高社会信用体系市场化社会化水平]***

This Opinion consists of four parts: (1) Vigorously cultivate the credit service market; (2) Deepen the promotion of credit financing and credit transactions; (3) Strengthen credit construction in the platform economy; and (4) Serve high-level opening up. This section suggests the role of private enterprises within the project of developing social credit.  It also reaffirms the reversal from the early stages where private enterprises were expected to lead; the sense now, a sense reflecting recent discussion of the relation between the private and state sectors in China.[[18]](#footnote-18) This underscores a complementary and gap filling role for private enterprise under the direction of state organs charged with overall coordination. The section also suggests that the project of digitization and digitalization (the platform economy) remains a central objective under the 3rd Plenum's innovation driven approach to socialist modernization. It is also meant to align with the recent renewal of efforts to encourage foreign invest in China and project Chinese foreign investment abroad.[[19]](#footnote-19) It also may be fashioned as an instrument for broadening the internal markets in the context of implementing dual circulation strategies. This is especially important with the re-election of Donald Trump to the U.S. Presidency.

***3.7 Strengthen organization and implementation [加强组织实施].***

This section recognizes the state of administrative governance in China, and the fundamental division, at an operational level, between the Peoples Bank of China on the one hand, and the National Development and Reform Commission on the other.  It also recognizes as it must, the more daunting task of coordinating from the top the activities of lower level actions, regulations, etc. at the provincial and local levels.  Nothing new here, but the challenge (and likely points of coordination friction) are acknowledged.[[20]](#footnote-20) It will be for the core CPC leadership to sort that out as and to the extent it makes sense. But what is clear is that social credit as understood here is, in the first instance, a critical element in the construction of the new socialist market economy,[[21]](#footnote-21) and in that sense is understood in a quite specific and narrow way, one confined to the Social Credit law itself, but not to the concept of social credit as something far more (potentially ambitious. .

**4. Where Does that Leave SCS?**

There may be a few initial propositions worth considering in the shadow of the 中共中央办公厅国务院办公厅关于健全社会信用体系的意见 [Opinions of the General Office of the CPC Central Committee and the General Office of the State Council on Improving the Social Credit System.

1. While the Opinion devotes a substantial amount of space to the technicalities of legalism, its principal value may in the way in which it may seek to use social credit (understood broadly as a set of ways of managing or governing) to more intimately align administrative legalism with the overall objectives based policies of the CPC itself. That is, that the social credit methodologies may serve as a bridge between the operations of an administrative nomenklatura and its caste of bureaucrats and officials, with the overall direction of CPC. Consider in this respect the embedding of "Eight Provisions" [八项规定] into the working architecture of state and private organs.[[22]](#footnote-22)

2. SCS might also be deployed as a digitalized mechanism for the elaboration of critical dialectics in the operation of the policies developed to propel the nation along the Socialist path.[[23]](#footnote-23) As the General Secretary noted, there is a need for the coordination (1) of the relationship between effective markets and effective government; (2) of the relationship between aggregate supply and demand for stability of a coordinated economy; (3) of the relationship between old and new technologies of production around the concept of new and high quality production in socialist modernization; (4) of the relationship between incremental and comprehensive improvements; and (5) of the relationship between quality of production and production volume in ways that augment the frits of socialist modernization.[[24]](#footnote-24) All of these are fodder for the Opinion. As I have suggested elsewhere:

It finds its greatest expression aligned to another significant area of theoretical evolution—that of socialist modernization and the relationship between the development of productive forces and the guidance role of the CPC. One might speak now of the dialectical coordination of socialist modernization. And that dialectical coordination touches all aspect of social relations in which the obligation to develop productive forces is found—in the economic, social, cultural, environmental, and political fields of social organization. In this sense, dialectical coordination serves as a nexus point for the material expression of the unity of these concepts—dialectical materialism, democratic centralism, socialist modernization, and the nature of the material expression of the leading role of the CPC.[[25]](#footnote-25)

Its expression in the Opinions is straightforward and ambitious: “Build an SCS that covers all kinds of subjects, unifies institutional rules, and is co-built, co-shared and co-used. Promote the deep integration of the SCS and all aspects of economic and social development to provide a powerful pillar for accelerating the building of a unified big market, maintaining fair and orderly competition market order, and promoting high-quality development.”[[26]](#footnote-26)

3. SCS may be one aspect that a set of techniques that will eventually be as important for the disciplining of the Party as it is for the nation.[[27]](#footnote-27) In this respect SCS forms a critical component of socialist modernization of the structures of socialist collectivity and the techniques for its discipline. As I suggested elsewhere:

The 3rd Plenum of the 20th CPC Congress made it quite clear that Chinese style socialist modernization had moved again to the center of policy. With it, and as one of its essential elements was the objective of high quality production. Socialist modernization is meant to apply to all of the productive forces of the nation. And those productive forces all must engage in some process of self-revolution; for economic enterprises that focuses on innovation; for social collectives on high quality engagements with social and cultural practices for state organs it might focus on efficiency and technological innovation to ensure that its functions fulfill the expectations of the CPC and the masses; and for the vanguard party, the CPC, it must necessarily focus on self-revolution.[[28]](#footnote-28)

4. The development of *trust* in the nation and the CPC, especially through the assessment and data driven mechanisms of SCS may serve China’s international policy objectives.[[29]](#footnote-29) In that respect, China’s use of SCS techniques serves an international agenda that produces win-win situations with respect to alignments with certain global expectations now emerging, including for example, ESG (environmental, social and governance reporting).[[30]](#footnote-30)

5. The Opinion appears designed to please everyone. For the legalists and the legal academic establishment, it provides a bridge between the analytics of social credit and its focus on data, and the traditional modalities of governance (traditional at least since 1978 in its current form). For the normative and Party centered elements, it offers the mechanisms for coordinating the ecologies of perfection—in the economic, political, administrative, and social spheres. Though the focus appears to be on the economic, and with it on the traditional core of socialist modernization, it ought to be remembered that after the 3rd Plenum socialist modernization has become a broader instrument for comprehensive change.

6. Taken as a whole, one might consider the extent to which the document furthers the CPC’s role as a cultural leader. Here it suggests the way that socialist rule of law operates even within emerging technologies. One night read the Opinion as a whole for the proposition that it suggests a culture of governance, with the Party at its core, that comprehensively articulates the forms of behavior through the lens of socialist modernization in the new era.[[31]](#footnote-31)

7. Lastly, consider the elements of the Opinion. First, social credit must adhere to and express the ideological political-economic framework within which it is an instrument and an expression.[[32]](#footnote-32) Within that framework, social credit will be undertaken comprehensively in all of the key areas of Chinese collective and individual organization.[[33]](#footnote-33) That system is, in turn, grounded in data, whose production, protection, and deployment must be coordinated through the state under the guidance of the Party and within the specifications of law created for that purpose.[[34]](#footnote-34) All of this effort elaborates the still fundamental starting point for the elaboration of a social credit based system(s), the notion of trust, now understood in its political, economic, social, and cultural dimensions, though elaborated principally through the lens of socialist modernization (but again understanding that within socialist modernization is the principle that everything is a productive force).[[35]](#footnote-35) These measures directed toward those ends will fail in the absence of strong quality control measures.[[36]](#footnote-36) And social credit serves no useful purpose if it is not intimately integrated into the improvement and deployment of productive forces in every sphere of social relations, but, given the imperatives of the contemporary general contradiction, which must be focused on economics and social behaviors.[[37]](#footnote-37) Thus understood and directed, social credit becomes useful when appropriately utilized and implemented.[[38]](#footnote-38) Put in this way, one might perhaps note the way in which the social credit regimes discussed will serve as template for every aspect of organized life whether within the state, private, or social sectors, and with equal application to domestic and international engagement. The challenge, of course, will be to transpose these theoretical engagements into something operational. And it is to those ends that much of the detail in the Opinion is devoted.

8. And thus the essence of the Opinion, like that of the socialist modernization within which it is embedded, and through which it is both empowered and constrained, social credit is an all-around concept, an important means of rationalizing the entirety of the project, overseen by the Communist Party of China, to develop all of the productive forces of the Chinese nation toward the ends of establishing a communist society for the nation.[[39]](#footnote-39)

These considerations then frame the challenges that the Opinions expose. The first touches on the significance of SCS. To a large extent, the Opinions suggest that the core utility of SCS (however understood or applied) is as a tool of discipline, and as a mechanism for accountability. These primary objectives both measure the effectiveness of SCS in any context by means of the fulfillment of the stability function which was at the center of Opinions No. 1. These can then be understood in their constitutional dimension. That, certainly is true enough. And yet, it might be taken as a basic element of Marxist-Leninism that it is a dynamic rather than a stabilizing process. While stability is important, certainly for the fulfillment of objectives at any stage of historical development. It is also quite clear that stability is not an end goal but a means, and risk aversion as a means of minimizing the burdens of change rather than avoiding them. In this sense SCS must be understood as a high quality innovation for the basic goal of moving society, and its productive forces, along the Socialist Path and towards its goal—the (eventual) establishment of a Communist society in China. This produces the possibility of contradiction that must be confronted.

Second, it is clear that while SCS, within its webs of Socialist Legality, Socialist Modernization, and Socialist Internationalization targets the administrative apparatus, social collectives, and the masses (as individuals and in societal organs), SCS in that guide does not reach the structures, operations, and working style of the CPC itself. That is not to say that there is no SCS for the Party; it is rather to suggest that, at least within the purview of the NDRC and the Central Bank of China, which together have been tasked with the coordination and implementation of the Opinions generally, that purview does not extend to the work of the CPC itself as a political leadership and guidance organization. That raises the issue of the way in which the CPC will itself apply the techniques and technologies of SCS to its own disciplinary and behavior projects.

Third, it is not clear what is driving policy. It is possible to see in the Opinions the role of ideology in driving SCS functionality. AT the same time, it is possible to reverse polarity, and also see in SCS the driving force of ideology. That touches, in turn on an inherent contradiction of new quality productivity within Marxist-Leninist theory. That contradiction turns of the primacy of new or high quality production at the heart of a more comprehensive understanding of New Era socialist modernization. In this sense, at least, SCS would constitute an expression of new quality production, and as a means of elevating an innovative approach to the utilization of productive forces. Nonetheless, SCS is also not just an object of socialist modernization in that sense but also its expression. SCS is in that respect a fulfillment and the character of ideology.

Fifth, the Opinions, not unexpectedly, leaves key issues unresolved. The principal issue in need of resolution touches on the definition of SCS. SCS could be understood as a regulatory tool; or it could be treated as the methods developed to manage systems of data based rewards and punishments generally. Yet that issue also touches on a more difficult issue—that is on the issue of the strategically narrow definition of SCS as a subset of a much larger pool of related techniques and approaches to regulation, but one designed to limit the issues of coordination with Socialist legality, modernization, and internationalization in what may be inconvenient ways for the State. And, needed, one understands that SCS may be constructed from out of the cocktail of legalities to which legality may be applied. As for everything else, other legalities may be relevant. Thus SCS is to be distinguished from, for example, smart city projects. The Opinions, however, appear to paint SCS more broadly than it appeared to have been narrowed after 2014. The inclusion of governmental SCS may be an example. On the one hand governmental credit may be defined quite broadly to include the disciplining of the entire scope of the administrative apparatus of state. And yet, the language in the original is as easily restricted to certain public institutions—hospitals, state owned enterprises, and other public mechanisms for the delivery of services in fields in which private service providers also operate. The former would represent a broadening of SCS, and with it the application of Socialist legality. The later would evidence the continued vitality of strategic fracture.

Sixth, the extent of SCS as an ideologically relevant driving force is unclear. Treating SCS as mere technique—as the sort of high quality productive innovation at the root of 3rd Plenum modernization—serves those who would continue to privilege the fundamental position of human administrative organs in the operation of the state. Nonetheless, SCS might also be understood as a subset, as an ideological space, within or through which the broader concepts of Socialist Legality, Socialist modernization, and Socialist Internationalism may be developed. It is in this sense a New Era expression of both the mass line, of the operationalization of democratic centralism through the digitalization of democratic centralism now bound up in the algorithms through which policy objectives are fulfilled, and in the digitalization of coordination which is a primary function of the central authorities with respect to the state sector and the leadership of all other forms of human collective relations in China.

Lastly, the Opinions rase, but do not confront, the fundamental ideological issue within Chinese Marxist-Leninism of the “the problem of the problem.” This issue underlies the conceptual turmoil within which SCS itself is signified as problematic, even as it is deployed as a resolution of the problem against which it is deployed. At the root of the turmoil is dissonance. This dissonance reflects a conflict (and the contradiction, in Chinese Leninist terms) between the old humanizing techniques of control (on the one hand) and its virtual transformation (on the other hand). Connected to that is the dissonance between the pathways and linkages of digitalized regulatory environments and those attached to the human. Even if one could confront these contradictions--and especially its core dilemma, that is in what space, real or virtual, does regulation occur—SCS represents a moving target (and again invoking the dissonance between the ideology of high quality development and the bureaucratic embrace of the superiority of stability in a Marxist Leninist environment that tends to be risk averse). SCS is a human and artificial construct over a dynamic process of the movement from the physical to the virtual and from the qualitative and exogenous to the quantitative and endogenous. That last is a contradiction the resolution may well need to wait until China enters into its next stage of historical development—that is it may be a problem for the Post-New Era Chinese Leninist theorists.

**5. Concluding Thoughts**

SCS remains very much a work in progress. Nonetheless, a decade or more after its quite splashy appearance within the official pronouncements of the Chinese core of leadership, SCS appeared to have been sidelined. The 2025 Opinions discussed in this essay might be best, and most straightforwardly understood as a signaling that SCS is neither dead, nor has the 2014 vision been abandoned. Nonethless, that vision now required coordination. The first of that coordination is ideological, between SCS as an expression of an ideology of regulation and of the methods by which the CPC can lead the nation on the Socialist Path, and other critical ideological developments that mark the fundamental characteristics of Chinese Marxist-Leninism in the New Era: Socialist Legality, Modernization, and Internationalization. The second of that coordination element is operational. SCS is not so much driving change as its forms and operations are being consolidated in the form that they have taken since 2014. That does not necessarily mean that SCS will be confined to its current condition. Indeed, it is clear that SCS as a conceptual rather than operational construct is far broader and more vibrant than its appearance within the administrative apparatus. At the same time, the (re)focusing on SCS is a reminder of the critical role of SCS within the regulatory framework of virtually every collective organ (and with respect also to individuals) within China; of the critical role of data and data management for that regulatory framework; of the equally critical role of normative values built around a broader conception of trust for the activation of data based governance broadly applied; of the centrality of an apparatus to deliver value for SCS methods; of the still central need to more deeply embed SCS sensibilities and expectations within the social relations of the nation and abroad; and of the critical role that distinctions between bureaucratic and Party measures are to be understood for the fulfillment of whatever promise of SCS that the CPC deems worth pursuing. What follows is the only certainty that can be gleaned from the Opinions document—that SCS is neither being abandoned, nor is it necessarily confined to operational matters driven by other forms of regulatory structures. When to all of this is added what appears to be an emphasis on stability (within which experimentation and risk taking may be possible) but under an assessment regime that appears to be risk averse, then, for the moment at least, one can expect movement toward consolidation and coordination, rather than a focus on innovation and new forms of high quality SCS production.,

1. These materials represent an extended elaboration of a presentation made at a Workshop of the Social Credit Study Group, European China Law Studies Association Research Hub, University of Cologne, Germany (virtual) 29 April 2025. [↑](#footnote-ref-1)
2. State Council Notice concerning Issuance of the Planning Outline for the Establishment of a Social Credit System (2014-2020), State Council Release (2014) No. 21, <https://www.chinalawtranslate.com/en/socialcreditsystem/> (hereafter State Council White Paper 2014). The PowerPoint is available online at <https://www.backerinlaw.com/Site/podcasts/powerpoint-presentations/>. [↑](#footnote-ref-2)
3. Larry Catá Backer, China's social credit system: Data-driven governance for a 'new era', Current History 118(809):209-214 (2019). [↑](#footnote-ref-3)
4. Resolution of the Central Committee of the Communist Party of China on Further Deepening Reform Comprehensively to Advance Chinese Modernization (21 July 2024), <https://www.mfa.gov.cn/eng/xw/zyxw/202407/t20240721_11457437.html> (§II (Building a High-Standard Socialist Market Economy)¶7 “We will also improve the social credit system and related oversight institutions.”) [↑](#footnote-ref-4)
5. “中国社会的政治密码：外儒内法,” [The political code of Chinese society: Confucianism on the outside and law on the inside], https://www.wenxuecity.com/blog/202406/44445/965.html. [↑](#footnote-ref-5)
6. See Larry Catá Backer, Trust platforms: The digitalization of corporate governance and the transformation of trust in polycentric space, Regulation & Governance (2024) doi:10.1111/rego.12614. [↑](#footnote-ref-6)
7. See, e.g., Larry Catá Backer, Next Generation Law: Data-Driven Governance and Accountability-Based Regulatory Systems In The West, and Social Credit Regimes in China, Southern California Interdisciplinary Law Journal 28:123 (2018). [↑](#footnote-ref-7)
8. See, e.g., Larry Catá Backer, Social Revolution (社会革命) as Self-Revolution (自我革命) and the New Quality Production of CPC Modernization: 习近平 深入推进党的自我革命 [Xi Jinping, Deepen the Party's Self-Revolution] (Part of a speech at the Third Plenary Session of the 20th Central Commission for Discipline Inspection on January 8, 2024)). [↑](#footnote-ref-8)
9. Larry Catá Backer, Social Credit “in” or “as” the Cage of Regulation of Socialist Legality, The China Review 24(3):71-106 (2024). [↑](#footnote-ref-9)
10. Larry Catá Backer, Trust Platforms: The Digitalization of Corporate Governance and the Transformation of Trust in Polycentric Space, Regulation & Governance (2024) doi:10.1111/rego.12614. [↑](#footnote-ref-10)
11. State Council White Paper 2014, supra. [↑](#footnote-ref-11)
12. For Context see Qin Hui 秦晖, The China Story, <https://www.thechinastory.org/key-intellectual/qin-hui-%E7%A7%A6%E6%99%96/>. [↑](#footnote-ref-12)
13. [全面强化司法执法体系信用建设。加强法院、检察院司法公信建设，提高司法公信力。依法加大司法公开力度，保障人民群众知情权。加强司法执法人员信用建设，建立执法人员信用记录和信用承诺制度。提高虚假诉讼违法失信成本。严格失信被执行人认定程序，优化相关失信惩戒措施。] [↑](#footnote-ref-13)
14. See, e.g., China to pursue reform in sync with rule of law, NCP Website, <http://en.npc.gov.cn.cdurl.cn/2024-07/25/c_1007719.htm> (“The country must "see that all major reforms have a solid legal basis and that the reform achievements are elevated to law in a timely manner," according to the resolution” citing to the Resolution of the 3rd Plenum). [↑](#footnote-ref-14)
15. [强化全国信用信息共享平台信用信息归集共享“总枢纽”功能，坚持以共享为原则、不共享为例外，统一归集各领域信用信息，根据需求按规定向有关部门提供信用信息服务，定期开展归集共享质效评估] [↑](#footnote-ref-15)
16. Marianne von Blomberg, The Social Credit System and China’s Rule of Law, in Oliver Everling (ed) *The Social Credit System and China’s Rule of Law* (Springer, 2020), pp. 111–137. [↑](#footnote-ref-16)
17. [推进信用报告深度应用。推动在市场准入、行政审批、政府采购、招商引资、资质审核等公共管理领域充分使用信用报告。大力推行以专项信用报告替代有无违法违规记录的证明。鼓励在招标投标、融资授信、商业往来等市场交易活动中使用信用报告。]. [↑](#footnote-ref-17)
18. 习近平：民营经济发展前景广阔大有可为 民营企业和民营企业家大显身手正当其时 [Xi Jinping: The development prospects of the private economy are broad and promising. It is the right time for private enterprises and private entrepreneurs to show their talents] and the Maturing of the two unwaverings [两个毫不动摇] policy), <https://mp.weixin.qq.com/s/i92U-PATFdZkDkGey8ygbg>. [↑](#footnote-ref-18)
19. Discussed in Larry Catá Backer, Coordinating the Two (Dual) Circulation Economy: General Secretary Xi Meetings with Foreign Business and Commercial Officials, Law at the End of the Day (30 March 2025), <https://lcbackerblog.blogspot.com/2025/03/coordinating-two-dual-circulation.html>. [↑](#footnote-ref-19)
20. These might be best inderstood in the context of the 2022 encounter with social credit, 中共中央办公厅 国务院办公厅印发 《关于推进社会信用体系建设高质量发展 促进形成新发展格局的意见》[ General Office of the Chinese Communist Party Central Committee and the General Office of the State Council "Opinions on Promoting the Construction of a Social Credit System with High-Quality Development and Promoting the Formation of a New Development Pattern"], <https://www.gov.cn/gongbao/content/2022/content_5686028.htm>. [↑](#footnote-ref-20)
21. Consider in that respect the following: 中共中央 国务院 关于新时代加快完善社会主义市场经济体制的意见 [Central Committee of the Communist Party of China Opinions on accelerating the improvement of the socialist market economic system in the new era]; (CPC Central Committee and State Council On Creating a Healthy Environment for Entrepreneurship) 中共中央国务院关于营造企业家健康成长环境 弘扬优秀企业家精神更好发挥企业家作用的意见; 中共中央办公厅印发《关于加强新时代民营经济统战工作的意见》The General Office of the CPC Central Committee issued the "Opinions on Strengthening the United Front Work of Private Economy in the New Era" ; An All-Around Cultivation of Socialist Morality--中共中央 国务院印发 [Issued by the Central Committee of the Chinese Communist Party]: 《新时代公民道德建设实施纲要》[The Outline of the Implementation of the Construction of the Moral Citizen in the New Era] [↑](#footnote-ref-21)
22. See, e.g., [中央党的建设工作领导小组召开会议 研究部署深入贯彻中央八项规定精神学习教育工作 蔡奇主持并讲话 李希出席并讲话](https://www.12371.cn/2025/03/12/ARTI1741781736715402.shtml) [The Central Party Building Leading Group held a meeting to study and deploy the study and education work on the in-depth implementation of the Central Committee's eight regulations. Cai Qi presided over the meeting and delivered a speech. Li Xi attended the meeting and delivered a speech]; see also 国家开发银行党委研究部署深入贯彻中央八项规定精神学习教育工作 [The Party Committee of the National Development Bank has studied and deployed the study and education work on the in-depth implementation of the spirit of the Central Eight Regulations], https://mp.weixin.qq.com/s/EAi9wZ\_RweNEo8LHtOkluQ. [↑](#footnote-ref-22)
23. 习近平, [经济工作必须统筹好几对重要关系](http://www.qstheory.cn/20250228/38bbd5e750c944abb05dbd63e83a6be4/c.html) [Xi Jinping, "Economic work must coordinate several important relationships"]. It was published to Issue 2025-1 of Qiushi [求是] [↑](#footnote-ref-23)
24. Ibid. [↑](#footnote-ref-24)
25. Larry Catá Backer, Economic Dialectics Must be Coordinated! Brief Reflections on 习近平, 经济工作必须统筹好几对重要关系 [Xi Jinping, "Economic work must coordinate several important relationships"] and Marxist-Leninist Phenomenology in Socialist Modernization, Law at the End of the Day (15 March 2025), <https://lcbackerblog.blogspot.com/2025/03/economic-dialectics-must-be-coordinated.html>. See as well, [习近平 深入推进党的自我革命](http://qstheory.cn/20241214/3bbf801151ce4ff48ce176aeba23b862/c.html) [Xi Jinping, Deepen the Party's Self-Revolution] (Part of a speech at the Third Plenary Session of the 20th Central Commission for Discipline Inspection on January 8, 2024)). [↑](#footnote-ref-25)
26. Opinions, supra, Section 1. [↑](#footnote-ref-26)
27. 习近平：健全全面从严治党体系 [Xi Jinping: Improve the system of comprehensive and strict governance of the Party], <https://mp.weixin.qq.com/s/W5Qqpb_RlABkYiwdHNfnZQ>. [↑](#footnote-ref-27)
28. Discussed here: <https://lcbackerblog.blogspot.com/2025/02/xi-jinping-improve-system-of.html>. [↑](#footnote-ref-28)
29. [Address by Vice-Premier Ding Xuexiang](https://www.chinadaily.com.cn/a/202501/22/WS679043d8a310a2ab06ea8736.html)'s at World Economic Forum Annual Meeting 2025 (as published in China Daily). [↑](#footnote-ref-29)
30. Larry Catá Backer, ESG Along the Socialist Path: China's Long March to an Institutionalized ESG Reporting System; The Original Text of the New (Trial) Basic Standards 企业可持续披露准则——基本准则（试行）, Law at the Endo f the Day (7 January 2025), <https://lcbackerblog.blogspot.com/2025/01/esg-along-socialist-path-chinas-long.html>. [↑](#footnote-ref-30)
31. 宋月红, [坚守党的文化领导权和中华民族的文化主体性 [](http://www.qstheory.cn/dukan/hqwg/2024-07/27/c_1130185883.htm)Adhere to the Party's cultural leadership and the cultural subjectivity of the Chinese nation]. [↑](#footnote-ref-31)
32. General Requirements [总体要求]. [↑](#footnote-ref-32)
33. Build a social credit system covering all types of entities [构建覆盖各类主体的社会信用体系]. [↑](#footnote-ref-33)
34. Consolidate the data foundation of the social credit system [夯实社会信用体系数据基础]. [↑](#footnote-ref-34)
35. Improve the trustworthiness incentive and dishonesty punishment mechanism [健全守信激励和失信惩戒机制] [↑](#footnote-ref-35)
36. Improve the supervision and governance mechanism based on credit [健全以信用为基础的监管和治理机制] [↑](#footnote-ref-36)
37. Improve the marketization and socialization level of the social credit system [提高社会信用体系市场化社会化水平] [↑](#footnote-ref-37)
38. Strengthen organization and implementation [加强组织实施] [↑](#footnote-ref-38)
39. 《红旗文稿》2024年第23期 Red Flag Articles (2024:23) [↑](#footnote-ref-39)