

# Updated on Dec 17 | FAQs of GACC Overseas Food Manufacturer Registration, by ChemLinked

BY Lennie Tao · Dec 17, 2021



*Questions are divided into three types: questions met before, during and after the registration.*

**Updated answers and newly added questions are in red color.**

\*\*\*Some answers below are given based on our compliance experience. Please take the further GACC notices as the final legal basis, including updates/new notices in the future. ChemLinked will keep following the dynamics and update latest info on our platform. Please stay tuned with us.

\*\*\*Moreover, manufacturer in this article and in GACC Decree 248 refers to production, processing and storage facility. All you should know about Decree 248 can be found [here](#). Feel bored reading articles? Watch the recording of ChemLinked webinar: [Prepare for China's Overseas Food Manufacturers Registration Under New GACC Requirements](#)

Questions are divided into three types: questions met before, during and after the registration.

## I. Questions Met Before the Registration

1. Does Decree 248 apply to bulk food?

Yes.

2. Is B2B food additives manufacturer exempted from the registration?

Yes, you are exempted from this registration.

3. Is "Carrageenan" affected/included in GACC Decree. 248. It is applicable for food products mentioned below, but we are not quite sure if Carrageenan (as food ingredient) is considered as well in this Decree.

Food additive manufacturers are exempted from Decree 248. Carrageenan belongs to food additive.

4. How about the registration for fresh fruits?

Fresh Fruit exports are covered by agri protocols and therefore not covered by the two Decrees.

5. Which is the competent authority for each country, the one responsible for customs or the one assigned for food administration?

Not the customs. The competent authority refers to the authority in charge of the safety and sanitation rules of food manufacturers in the country/region. (legal basis: article 26 of Decree 248). FYI, in many places, it refers to authorities like FDA, agriculture department, etc.

6. What should we do if some of our products are in the 18 food categories, while some are beyond?

For food manufacturers who have some products within the 18 food categories (e.g. dairy product), while some are outside the 18 food categories (e.g. biscuit), the manufacturer need to contact overseas competent authority first to get an assigned account for the manufacturer registration platform. After obtaining the account from the authority, the manufacturer can submit application for dairy products and biscuit products in the future. (The system account enterprises registered by themselves can only apply for the foods beyond the 18 food categories.)

[Updated on Dec 17, 2021] For enterprises that have already got the product registration number beyond the 18 food categories through self-registration, they can contact competent authorities in exporting areas or countries. The competent authority will accredit the system account. After that enterprises can apply for the registration of the 18 food categories with this system account. (answers given by GACC)

7. Do companies in the type 2 category (other than the 18 categories) that were previously registered on IRE database (<http://ire.customs.gov.cn/>) as manufacturers or exporters, need to go through the self-registration process on the single window platform?

Yes, you need to apply for the self-registration. Manufacturer registration (on the single window platform) is different

from IRE database. IRE database is mainly for importers in China and overseas exporters to put a record with GACC about the basic information related to imported foods. The function of IRE database is to trace imported foods, etc. It is not mandatory for manufacturers to get registered on the IRE database.

#### 8. How to register for manufacturers from one company but locate in different countries?

Need to apply for them separately. They will be regarded as different manufacturers, although they belong to one company. It is because the applicant should be the manufacturer, not the company.

#### 9. How to know the corresponding food category and registration method?

You can find the answer in the registration system. Click the button of "Product type query" in the left menu. Then input the HS Code of your product and click "Query". If the word "NO" appears under the "Officially Recommended Registration" column, it means enterprises need to apply for the registration by themselves or by agents. (Click [here](#) to see how to get access to the system)

Order...	HS code	Product name	CIQ code	CIQ name	Product category	Officially ...
1	0201100010	整头及半头鲜或冷藏的野牛肉	102	整头及半头鲜或冷藏的野牛肉(冷藏)	牛肉产品	Yes
2	0201100010	整头及半头鲜或冷藏的野牛肉	101	整头及半头鲜或冷藏的野牛肉(鲜的)	牛肉产品	Yes
3	0201100090	其他整头及半头鲜或冷藏的牛肉	101	其他整头及半头鲜或冷藏的牛肉(鲜的)	牛肉产品	Yes
4	0201100090	其他整头及半头鲜或冷藏的牛肉	102	其他整头及半头鲜或冷藏的牛肉(冷藏)	牛肉产品	Yes
5	0201100090	其他整头及半头鲜或冷藏的牛肉	103	其他整头及半头鲜或冷藏的牛肉(冷藏)(30月龄以下)	牛肉产品	Yes
6	0201200010	鲜或冷藏的带骨野牛肉	101	鲜或冷藏的带骨野牛肉(鲜的)	牛肉产品	Yes

#### 10. What if the production address changes? Do we have to register once again from the beginning? Or only making amendment for the necessary part?

It should be discussed based on two situations. If only the name changes, no changes with the actual location, then you only need to apply for alteration. Because it will not bring any change for food safety and sanitation management. But if the location is changed (the factory moves to another place), in this case, you need to submit a new registration application.

#### 11. I would like to check if this Decree is also applicable to Hong Kong and Macau? Or just Mainland China?

Just Mainland China.

#### 12. Where to download the service guideline and attachments (e.g. application form template) related to overseas food manufacturer registration?

See the link here: Overseas Food Manufacturer Registration [Service Guideline](#).

## II. Questions Met During the Registration

13. We already registered at the below website, however we cannot proceed because it says in the website that we are not authorized.

Are you applying for the registration of products within the 18 food categories? If you get the system account by yourself, you are not authorized to register the 18 food categories and can only apply for the application for categories beyond the 18 types. For the registration of the 18 food categories, please contact your competent authority. They will help with the procedure.

14. Which language should I use for the application? May I make the application only in English?

You can apply for it in English or Chinese. English is enough but Chinese is better, for the applications will be reviewed by Chinese GACC officials.

15. On the Product Correspondence part (under production related information), what means "affiliated company"? Is it suppliers only or other factory branches?

It can be your food ingredient supplier and reprocessing company.

16. Does "plant construction time" refer to when the production plant was established or when the company itself was established?

The manufacturer.

17. We did not do reconstruction or expansion. Is this item okay to be left blank?

It's ok. Without an asterisk (\*) mark, it means this is an optional item.

18. For GACC registration, what is product processing technology? Can you cite an example for this? Does it refer to serial number of each machine used in the production?

It refers to the information related to cleaning, the time and temperature for heat/cold treatment, dehydration, packaging, etc.

[Updated on Dec 17, 2021]

19. If my product has different brands, should I listed all the brands?

Not necessary.

20. We have got the registration number of the category "biscuit". What should we do if we want to add more products under this category in the future?

You can use the function of "alteration" to add more products in the future. (answers given by GACC. But CL found the current svstem does not support this function. Please wait for the launch of this function.)

21. We have submitted the application in the system, but we cannot confirm if it is approved/accepted.

You can check the status in the registration system. Click “Integrated query” in the left menu and then “application form query”. Choose the application type (e.g. registration application) and click “query”. If the application is approved, registration number will be shown below.

Order...	Application seri...	Registration nu...	Application time	Product category	Application type	Application status	Customs receipt	Institutional rec...	Data location	Operation
1	2021000000012	-				Examine	Examine	Enterprise	Examine	
2		-				Examine	Examine	Enterprise	Examine	
3		-				Examine	Examine	Enterprise	Examine	
4		-				Examine	Examine	Enterprise	Examine	
5	07	-				Examine	Examine	Enterprise	Examine	

### III. Questions Met After the Registration

22. How about products shipped in November/December 2021 but arrived January 2022? Will there be any grace period?

GACC clarifies that “For imported foods which will be shipped to China on and after Jan. 1, 2022, Chinese registration number shall be submitted during the import declaration. Otherwise, GACC will reject the declaration.” ([GACC Notice](#))

As for the food labeling, only the imported foods produced on and after Jan. 1, 2022 should label registration number on the inner and outer package of products. The registration number here refers to the registration number used in exporting country or the approved registration number in China. Manufacturers can mark either of the registration numbers on the package. Case study about registration number labeling can be found in ChemLinked webinar: [Prepare for China's Overseas Food Manufacturers Registration Under New GACC Requirements](#).

23. Which number should we write on the label as per Degree 248? Is it the registration number per product category or manufacturer registration number?

Registration number will be given for each food category, which means a manufacturer may have several registration numbers if it produces several food categories.

24. Can we use sticker to label the registration number?

GACC doesn't clarify, but we think stickers are allowed. However, if your product belongs to health food or special dietary food, then you can only label the registration number on the product package by printing.

25. What if the customer will provide the stickers. should we still need to put our registration number on the product



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label/sticker as the manufacturer?

Yes, you need to ask your customer to add your registration number on the stickers. (If your product belongs to health food or special dietary food, then you can only label the registration number on the product package by printing.)

For more info related to overseas food manufacturer registration, please email [contact@chemlinked.com](mailto:contact@chemlinked.com). We will update this Q&A as long as we got new info.

For enterprises that have language difficulties, REACH24H consulting group, the founder of ChemLinked, can provide consultation service regarding overseas manufacturer registration. **With successful registration experience, we can assist clients to complete the registration on the online platform.** Feel free to [contact us](#) if you need any help.