

Prepare for China's Overseas Food Manufacturers Registration Under New GACC Requirements

By ChemLinked
Nov 2021

REACH24H Food Regulatory Service



Email: contact@chemlinked.com

Regulatory Advisory & Solution

- Preliminary analysis on the feasibility of importation
- Requirements of the food import regulations

Product Compliance Review

- **GACC Imported Food Manufacturer Registration Service**
- **Ingredient Compliance Review**
- Label Review and Design

Product Registration

- Overseas Manufacturer Registration Chinese Label
- **Special Food Registration** (Infant Formula, Health Food, FSMP)
- Pet Food Compliance
- Food Contact Material Compliance

Regulatory Information Platform-ChemLinked

- Regulatory News, Expert Analysis and Interpretations
- Database and Tools
- Webinars and Training
- **Customized report**

Brand Marketing Service

Flagship store Operation

Tiktok, Taobao, JD, RED,
VIP, Kaola..

Brand Incubation

One-stop solution to
help brands to
establish distribution
system

KOL/KOC Campaign

Do brand promotion
through live-
streaming and
endorsements

Social Media Marketing

Tiktok, Wechat, Weibo,
Little Red Book...

Providing **one-stop solution** service to help brands to establish distribution system both through **General Trade and CBEC** in Chinese market so that brand products can be exposed to consumers in **all directions**.

CONTENTS

01

Overview of food importation requirements in China

- Major compliance duties during food importation
- Import procedures via general trade

02

Basic introduction of GACC manufacturer registration regulation

- Significance
- Flow chart of GACC registration supervision
- Alteration, renewal, suspension and withdrawal
- Application scope
- Labeling of the manufacturer registration No.

03

Procedures to obtain GACC manufacturer registration approval

- Precondition for registration
- Via recommendation from authorities
- Introduction about the registration platform
- Registration method
- Via individual applications
- Summary: duties of each party

04

Other importation requirements worth attention — Decree 249



PART 01

Overview of food importation requirements in China

- Major compliance duties during food importation
- Import procedures via general trade

Major compliance points during food importation (general trade)



① Catalogues of food exported to China from countries or regions that meet the assessment and examination requirements and conduct traditional trade with China

符合评估审查要求及有传统贸易的国家或地区输华食品目录

首页	肉类	水产品	乳制品	中药材	燕窝	肠衣	植物源性食品	蜂产品
Meat product; Aquatic product; Dairy product; Chinese medicine; Bird's nest; Casing; Plant-based food; Bee products								

乳制品名单

关键字: 国家和地区: 产品分类:

共检索到 1125 条符合条件的记录

序号	国家	准入产品类型	产品名称	准入状态	备注
1	阿根廷	乳制品	巴氏杀菌乳-pasteurized milk	正常	
2	阿根廷	乳制品	部分脱脂乳粉-partly skimmed milk powder	正常	
3	阿根廷	乳制品	调味灭菌乳-flavored sterilized milk	正常	
4	阿根廷	乳制品	调味乳粉-flavoured milk powder	正常	
5	阿根廷	乳制品	调制乳-modified milk	正常	
6	阿根廷	乳制品	发酵乳-fermented milk	正常	
7	阿根廷	乳制品	风味发酵乳-flavored fermented milk	正常	
8	阿根廷	乳制品	干酪-cheese	正常	
9	阿根廷	乳制品	黄油-butter	正常	
10	阿根廷	乳制品	加糖炼乳-sweetened condensed milk	正常	
11	阿根廷	乳制品	炼乳-condensed milk	正常	
12	阿根廷	乳制品	正牌乳-sterilized milk	正常	

<http://43.248.49.223/>

- ② Overseas manufacturer registration (be explained later)
- ③ Registration systems of imported food importers and exporters (see below)



The screenshot displays the homepage of the 'Imported Food and Cosmetic Importers and Exporters Registration System'. At the top left is a logo featuring a key and a globe. The main title is '进口食品化妆品进出口商备案系统' (Imported Food and Cosmetic Importers and Exporters Registration System), with the English translation 'Registration Systems of Imported Food and Cosmetic Importers and Exporters' below it. The interface is divided into three main columns, each representing a different registration system:

- 境外生产企业信息记录系统** (Information Recording System for Manufacturer Overseas): This green section includes a globe icon, a '进入系统 login' button with a right arrow, and a '已记录信息查询 The record list query' link.
- 境外出口商或代理商信息备案系统** (Registration System for Exporters or Agents Overseas): This blue section includes a computer monitor and globe icon, a '进入系统 login' button with a right arrow, and a '已备案名单查询 The record list query' link.
- 境内进口商备案系统** (Registration System for Importers Within Borders): This blue section includes a computer monitor icon, a '进入系统 login' button with a right arrow, and a '已备案名单查询 The record list query' link.

At the bottom left, there is a '用户下载 DOWNLOAD' (User Download) section with a folder icon. Below this are four large buttons: '公告 Announcement' (green), '用户手册 User guidebook' (teal), '使用帮助 Notice and Auxiliary' (blue), and '联系方式 contact method' (blue).

<http://ire.customs.gov.cn/>

④ Quarantine and inspection requirements, documents for customs clearance, etc.

- [Food safety law](#) and its [implementation rules](#)
- [Law of the People's Republic of China on Import and Export Commodity Inspection](#)
- [Regulations for the Implementation of the Law of the People's Republic of China on Import and Export Commodity Inspection](#)
- [Law on the Entry and Exit Animal and Plant Quarantine](#)
- [Implementation Rules of Law on the Entry and Exit Animal and Plant Quarantine](#)
- ...

**Non-compliant
reasons**

⑤ Regulations and standards in China; Qualifications for certain products

Laws & regulations

Standards

Test methods

...

Ingredient ([ingredient review tool](#))

Labeling & claims

Contaminants

Advertising

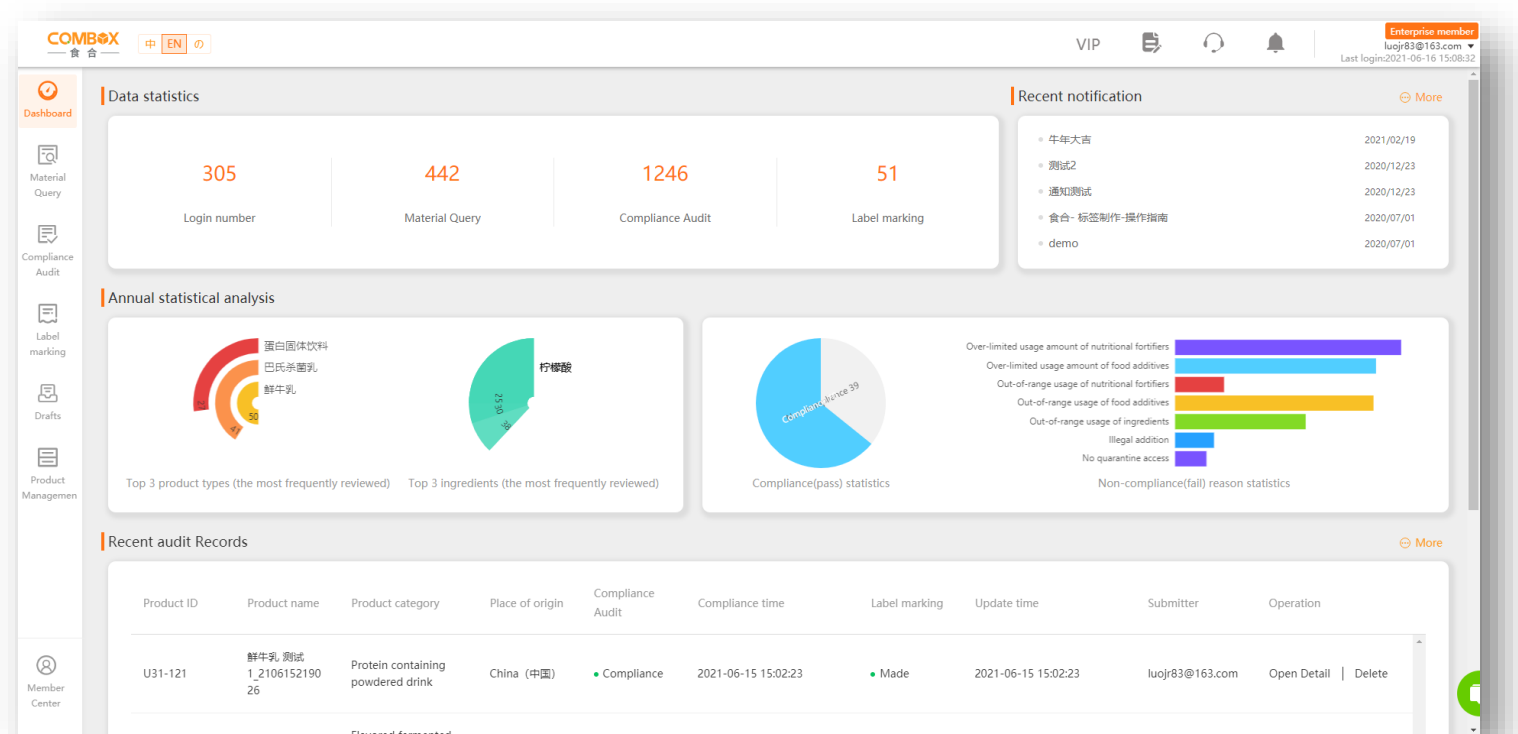
...

Food categories	Qualification
Infant formula	Recipe registration
Foods for special medical purpose	Product registration
Health food (with function claims)	Registration/Filing
Pet food	MOARA Registration
Organic food	Organic certificate
...	...

Email contact@chemlinked.com for registration service.

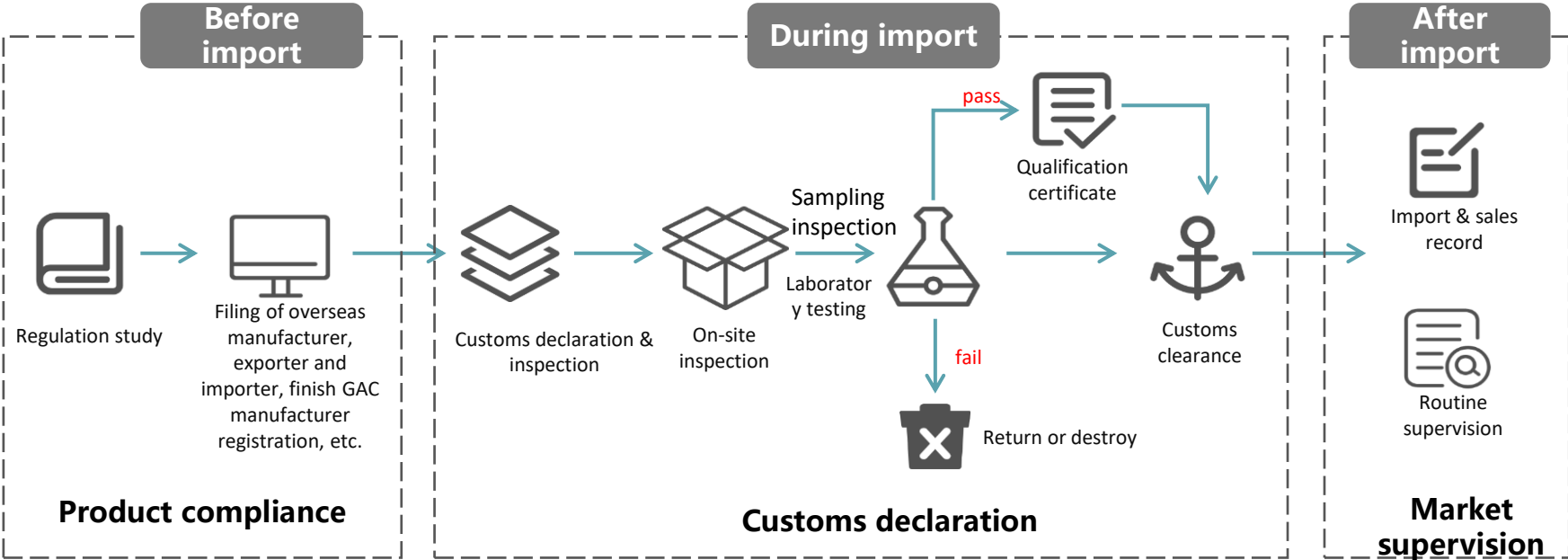
Functions of COMBOX (FOOD INGREDIENT TOOL)

- Food Compliance Information Centre (Dashboard)
- Ingredient Check
- Ingredients Compliance Review
- Label Making
- Product Management
- Multi-language System



<https://www.foodcombox.com/user/login>

Import procedure via general trade





PART 02

Introduction of GACC overseas manufacturer registration

- Significance
- Flow chart of registration supervision
- Alteration, renewal, suspension and withdrawal
- Application scope
- Labeling

2.1

Significance of GACC manufacturer registration

“

Article 96 ... **Overseas food producers exporting food to China shall get registered at entry-exit inspection and quarantine department.** The registered overseas food producers, if providing false material, or cause serious food incidents due to its own causes, will be removed from the registration list by the authority, and the removal will be announced by public notice.

”

China Customs (GACC)

— — China’s Food Safety Law

Specialized regulation



GACC Decree 248— Regulations of the People's Republic of China on the Registration and Administration of Overseas Manufacturers of Imported Food (updated in April 2021, take effect on Jan 1, 2022) ([English version](#))

- Article 4: Overseas manufacturers of imported food should get GACC registration approvals.
- Clarify duties of each party: manufacturer, importer in China, competent authority in exporting area, GACC

Grace period?

Application scope

Product scope	<div>1. The applicable scope is expanded to all food categories.</div> <div>Previously only 4 types</div> <div><div>① Aquatic products</div><div>② Dairy products</div><div>③ Meat products</div><div>④ Bird's nest</div></div> <div>2. Clarify the exempted products "food additives and food related products"</div>
Manufacturer scope	<div>Overseas enterprises that want to trade foods to China, including</div> <div><div>• Manufacturer</div><div>• Processing enterprise</div><div>• Storage enterprise</div></div>

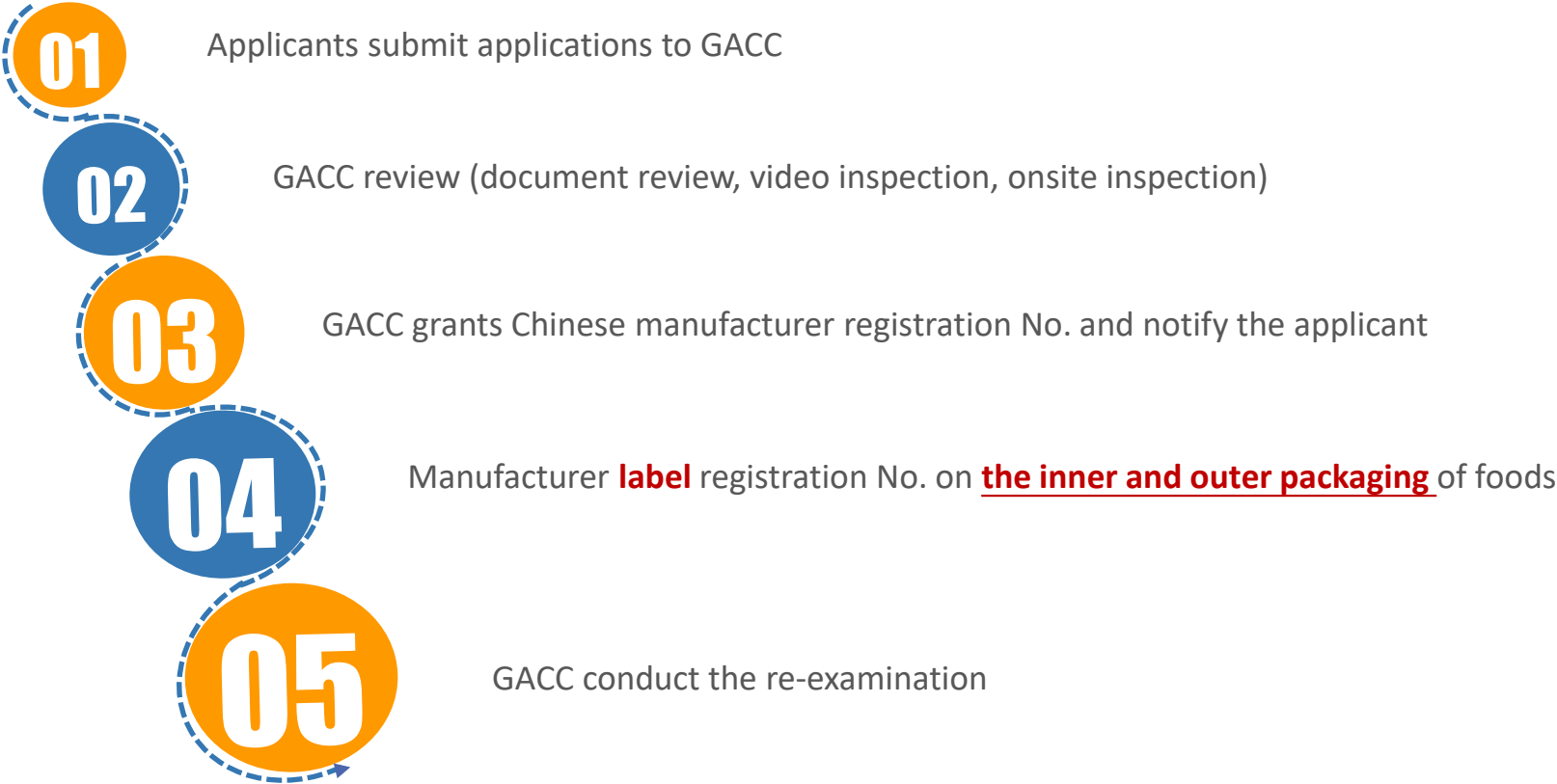
Alcoholic drink?
Beverage?/instant noodle

Food ingredient?

Pet food?

Exporters?
Shipper?

Flow chart of GACC registration supervision



2.4

Labeling of manufacturer registration No.

“Article 15

A registered manufacturer shall mark the **Chinese registration number** or the **registration number approved by the competent authority** of the country/region on the inner and outer packaging of the foods exported to China.”

Sticker?

本条明确已注册企业应当标注注册编号。已注册企业可以任意选择标注在华注册编号，或是所在国家（地区）主管当局批准的注册编号，给予企业便利和自主选择权。长远来讲，我们鼓励境外企业选择标注在华注册编号。

本条所指内外包装是指运输包装和含有独立包装的可单独销售的销售单元。对于运输包装，注册编号应清晰地标注在运输包装上。对于一个销售单元包含独立包装的可单独销售的预包装食品，在食品标签上标注注册编号，应按中国食品安全国家标准有关预包装食品标签通则相关要求执行。




Inner and outer packaging refers to transport packaging and sales unit.



How to label the product, when the **box** is sold as the minimal sales unit?




Case Study

When the box is for sale while the tea bag cannot be sold separately ...

Items	Description of situations	Need to label registration No.?
	Transport packaging	Yes
	Minimal sales unit	Yes
	Individual package inside the minimal sales unit, which can not be sold separately	No

Case Study

When the tea bag is designed for sale ...

Items	Description of situations	Need to label registration No.?
	Transport packaging	Yes
	Individual package inside the sales unit, which can be sold separately	Yes
	For sale as well	<p>If the packaging is transparent, then no need to label the registration No. on the box. The labeling is only required on the tea bag.</p> <p>If the packaging is not transparent, it is necessary to label the registration No.</p>

Alteration, renewal, suspension and withdrawal

Alteration

- Submit alteration application through the registration way
- Document: (I) A comparison table of registration item alteration information; (II) Supporting materials

Suspension

- Non-compliant items found after registration
- Epidemic situation, public health events, etc.



Validity: Five Years

Renewal

- 3-6 months before the expiration
- Document: (I) application (II) a statement that enterprise promises to continue to meet the registration requirements

Withdrawal

- Big food safety event
- Serious quarantine and inspection issues
- Big safety and hygiene management problems
- Failed to be compliant after rectification
- False material; hide info
- Refuse to cooperate
- Where the registration number is lent, leased, transferred, resold or impersonated.

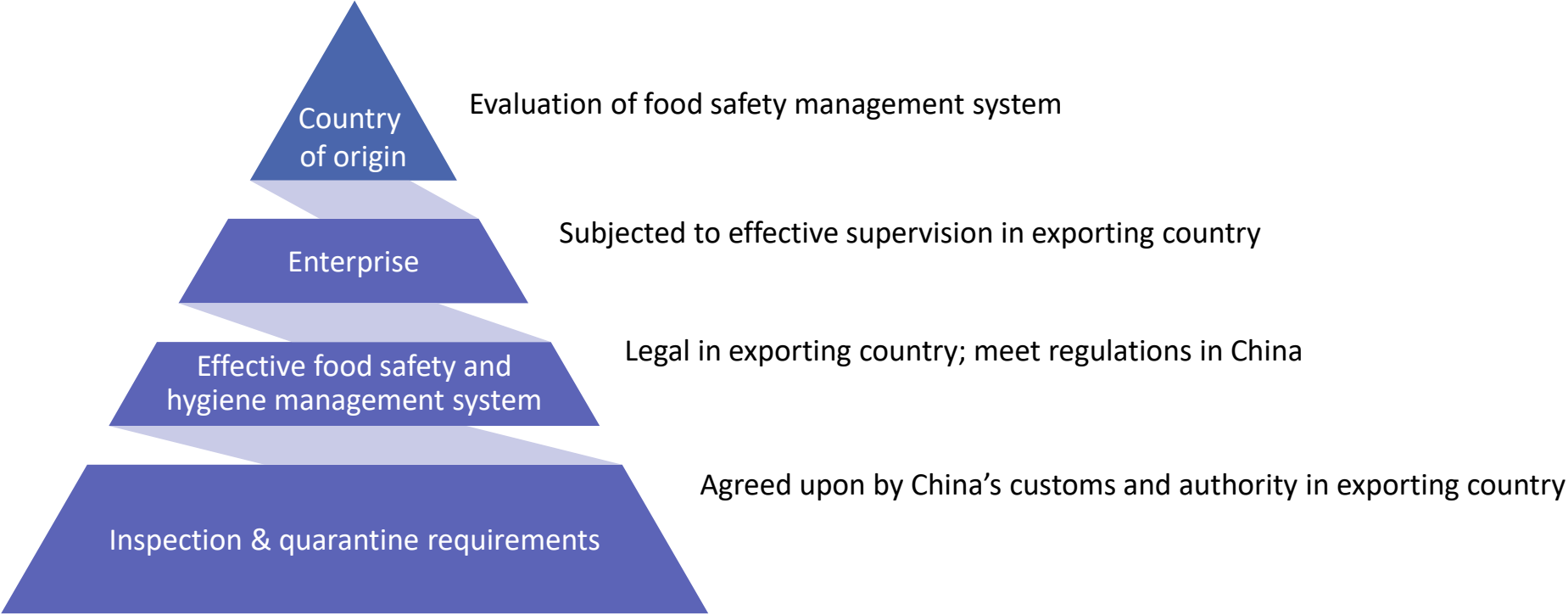
The background of the slide features a top-down view of various almond products on a light blue, textured surface. In the center, there are two small glass bowls: one containing whole almonds and the other containing almond meal. Surrounding these are several almond leaves, a few whole almonds, and a small white ceramic bowl. A blue paper tag with a string is visible in the upper left, and a wooden tag is in the lower right. The overall aesthetic is clean and natural.

PART 03

Procedures to obtain GACC manufacturer registration approval

- Precondition for registration
- Via recommendation from authorities
- Duties for each party
- Registration method
- Via individual applications

Precondition for registration

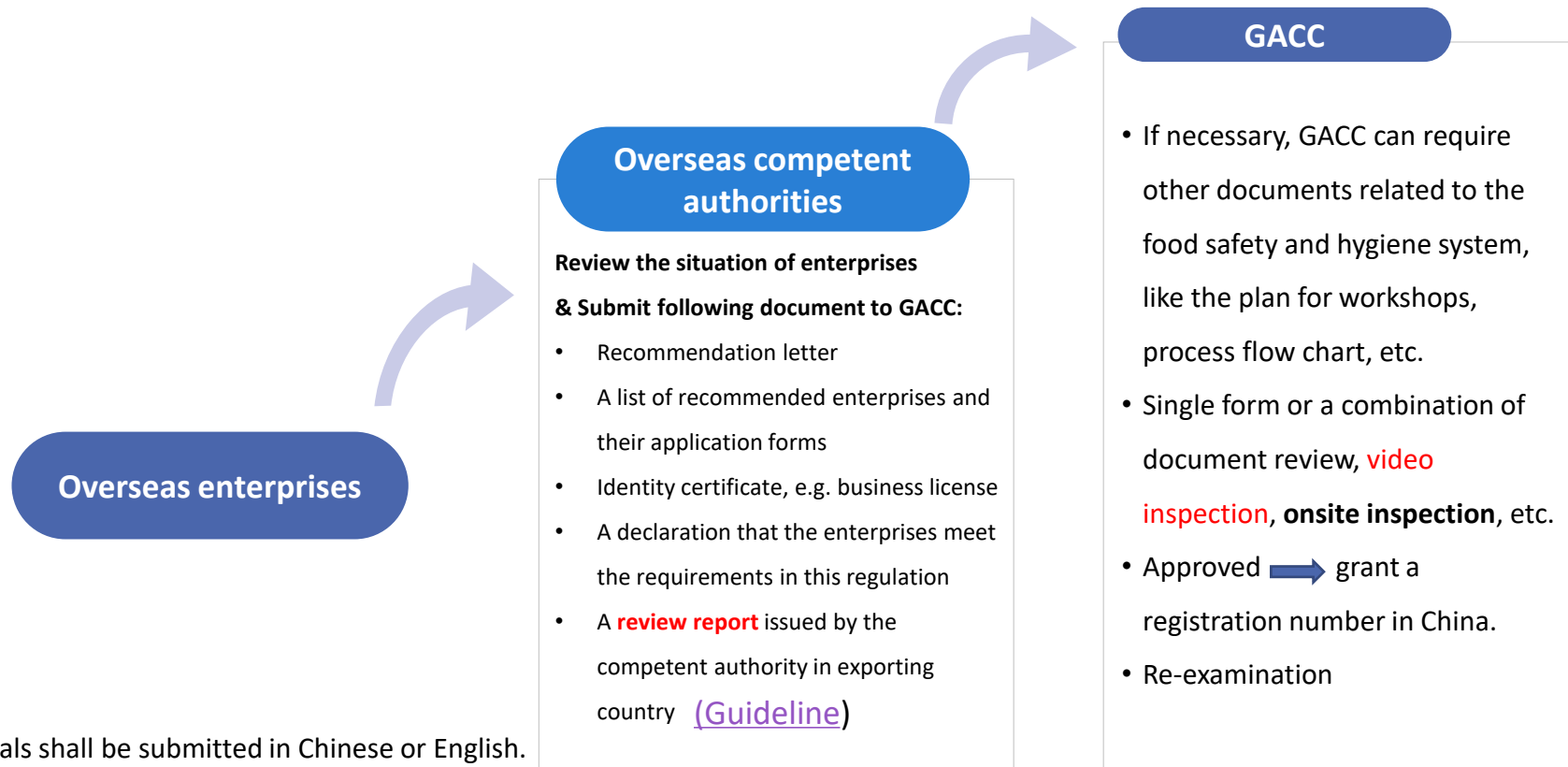


Registration method

	Type 1 Recommendation from the competent authority in exporting countries	Type 2 (newly added) Individual application from manufacturers
Food categories	18 food categories <u>Meat and meat products</u> , casing, <u>aquatic products</u> , <u>dairy products</u> , <u>bird's nest and bird's nest products</u> , bee products, eggs and egg products, edible oils and fats, stuffed pasta, edible cereals, industrial products of cereal flour and malt, preserved and dehydrated vegetables and dried beans, seasonings, nuts and seeds, dried fruits, unroasted coffee beans and cocoa beans, <u>special dietary foods</u> , health food	Except the 18 food categories (such as beverages, alcoholic drinks, biscuits)

Note: China’s GAC is eligible to **adjust the registration method and application materials of certain food categories based on the risk analysis of ingredient source, manufacturing technique, history data of food safety, consumption group, ways of eating, etc.*

Procedures under Type 1: recommendation from authorities (18 food categories)



Two situations under Type 1: recommendation from authorities

Product type	Current exporters	New exporters
Meat, aquatic, dairy and bird nest	Not influenced.	Follow the new requirements specified in “ Measures for the Safety Administration of Imported and Exported Foods ” and “ Administrative Provisions on Registration of Overseas Manufacturers of Imported Foods ”.
<p>14 food categories</p> <p>Casing, bee products, eggs and egg products, edible oils and fats, stuffed pasta, edible cereals, industrial products of cereal flour and malt, preserved and dehydrated vegetables and dried beans, seasonings, nuts and seeds, dried fruits, unroasted coffee beans and cocoa beans, special dietary foods, and health food</p>	<p><u>Preferential registration:</u></p> <p>Enterprises need to submit relevant information to their local competent authority. The authority shall compile a list of the whole country and submit to GACC prior to Oct. 31, 2021. (GACC will expedite the review)</p>	

Procedures under Type 2: individual application (other than 18 food categories)



**Application form include enterprise's name, located country/area, address, legal representative, contact person, contact info, registration number approved by local authority, food category, manufacturing capability, etc.*

Registration platform



<https://www.singlewindow.cn/>

Registration steps:

[Alert for Overseas Food Manufacturers: the Import Food Enterprises Registration Platform is Launched](#)

Email contact@chemlinked.com for manufacturer registration.

Front page

应用

 中国国际贸易单一窗口
China International Trade Single Window

进口食品境外生产企业注册

进口食品境外生产企业注册

注册申请

综合查询

进口食品境外生产企业注册

系统公告

标题	发布日期	发布者
 关于保障进出口企业权益的重要通知	2020/09/23	中国电子口岸数据中心
 重要通知	2018/11/30	中国电子口岸数据中心



首页

申请单查询

产品类别查询

筛选条件

HS编码:

商品名称:


查询

重置

序号	HS编码	商品名称	检验检疫编码	检验检疫名称	产品类别	需官方推荐
1	0203119090	其他鲜或冷藏的整头及半头猪肉	102	其他鲜或冷藏的整头及半头猪肉(冷藏)	猪肉产品	是
2	0203120010	鲜或冷的带骨野猪前腿、后腿及肉块	101	鲜或冷的带骨野猪前腿、后腿及肉块(鲜的)	猪肉产品	是
3	0203120010	鲜或冷的带骨野猪前腿、后腿及肉块	102	鲜或冷的带骨野猪前腿、后腿及肉块(冷藏)	猪肉产品	是
4	0203120090	鲜或冷的带骨猪前腿、后腿及其肉块	101	鲜或冷的带骨猪前腿、后腿及其肉块(鲜的)	猪肉产品	是
5	0203120090	鲜或冷的带骨猪前腿、后腿及其肉块	102	鲜或冷的带骨猪前腿、后腿及其肉块(冷藏)	猪肉产品	是
6	0203190010	其他鲜或冷藏的野猪肉	101	其他鲜或冷藏的野猪肉(鲜的)	猪肉产品	是
7	0203190010	其他鲜或冷藏的野猪肉	102	其他鲜或冷藏的野猪肉(冷藏)	猪肉产品	是
8	0206490000	其他冻猪杂碎	107	其他冻猪杂碎(猪蹄)	猪肉产品	是
9	0206490000	其他冻猪杂碎	109	其他冻猪杂碎(猪睾丸)	猪肉产品	是
10	0206490000	其他冻猪杂碎	110	其他冻猪杂碎(猪肾)	猪肉产品	是

Choose your food category (google translation)

Application

 **China International Trade Single Window** | Registration of imported food overseas production enterprises

Registration of overseas production enterprises for imported food <

Registration application

Integrated Query <

front page

Registration application

Registration is recommended by the competent authority of the country (region), please select the product category

Meat and meat products

Casings

Bird's Nest and Bird's Nest Products

Bee products

Eggs and egg products

Edible fats and oils

Stuffed pasta

Edible grains

Grain milling industry products and malt

Fresh and dehydrated vegetables and dried beans

seasoning

Nuts and seeds

dried fruit



Registration of overseas production enterprises for imported food <

Registration application

Integrated Query <



front page

Registration application

Vegetables and their products (except fresh and dehydrated vegetables)

Food products and other products

Tea

Nuts and seed products

Liquor

☐ Fermented wine and its blended wine

☐ Distilled wine and its blended wine

☐ Other original wine and edible alcohol

Beverages and frozen drinks

Biscuits, pastries, bread

Sugars (including raw sugar, table sugar, lactose, syrup, etc.)

Candy, chocolate (including chocolate, cocoa butter substitute chocolate and its products)

Condiments (not including sugar)

Roasted coffee beans, cocoa beans and their products (excluding chocolate)

Fruit products

Other miscellaneous food

Registration page

[front page](#)[Registration application](#)[Fermented wine and its blended wine](#)[Basic information of the company](#)[Production related information](#)[Enterprise statement](#)[Attachment information](#)[Temporary storage](#)[delete](#)

Basic information of the company

*Country (Region):

美国-United States of America

*Registration number approved by the competent authority of the country (region):

Name of the registration and approval agency in the country (region):

(In China) Registration Number:

(In China) Registration time:

(In China) Registration Validity Period:

*Company Name:

REA

*Address of production site:

*Plant construction time:

*Legal Representative:

*Phone of legal representative:

*Email of legal representative:

*Contact name:

*contact number:

*Contact email:

Date of renovation and expansion:

Reconstruction and expansion projects:

Reconstruction and expansion of production

Enterprise information



front page

Registration application

Fermented wine and its blended wine



Close

operation

Remark

*Corporate identity documents:

Updating files

Products to be registered/added to China

+ Add

Serial number	Specific products	HS code/CIQ code	product brand	Number of storage	Storage capacity	Annual design, production	Actual production	operate
---------------	-------------------	------------------	---------------	-------------------	------------------	---------------------------	-------------------	---------

No matching data

Export trade situation in the past 2 years

+ Add

Serial number	Export specific products	Export trade time	Export country or region	operate
---------------	--------------------------	-------------------	--------------------------	---------

No matching data

Next page

Enterprise information

front pageRegistration applicationFermented wine and its blended wine

Remark

*Corporat

Update

Products to

+ Add

Seria...Spe

Export trad

+ Add

Seria...

Products to be registered/added to China

*Production type:☐ Production ☐ Processing ☐ Store

*Specific products to be exported to China:

Please enter the specific products to be exported to China

*HS code/CIQ code:

*product brand:

No please fill in no

Number of storage warehouses (a):

Production type selection and storage need to be filled in

Storage capacity (cubic meters):

Production type selection and storage need to be filled in

*Annual design production and processing capacity (tons/year):

Please enter the annual design production and processing capacit

save

Reset

No matching data

Enterprise information (where to find the HS Code)

Remark

Products to be registered/added to China

*Production type: ☐ Production ☐ Processing ☐ Store

*Specific products to be exported to China:

*HS code/CIQ code:

*product brand:

2202910011-含濒危动植物成份散装无醇啤酒

2202910019-其他散装无醇啤酒

2202910091-含濒危动植物成份其他包装无醇啤酒

2202910099-其他包装无醇啤酒

2203000000-麦芽酿造的啤酒

2204100000-葡萄汽酒

Number of storage warehouses (a):

Storage capacity (cubic meters):

*Annual design production and processing capacity (tons/year):

No matching data

Manufacturing information

front pageRegistration applicationFermented wine and its blended wine

Basic information of the companyProduction related informationEnterprise statementAttachment information

oper.

Temporary storagedelete

Raw material/ingredient information

+ Add

Serial number	product name	Raw material/ingredient name	Country of origin	The ratio of the raw material...	operate
No matching data					

Production Correspondence

+ Add

Serial number	Specific products to be ...	Associated company na...	Does the affiliated com...	Registration number of ...	Whether the affiliated c...	operate
No matching data						

Production and processing water

*Water source:

☒ Public water ☐ Enterprise's own water source

*Whether to test the water quality of production/processing water:

☒ Yes ☐ no

Product processing technology

Enterprise statement

front pageRegistration applicationFermented wine and its blended wine

Basic information of the companyProduction related informationEnterprise statementAttachme

Temporary storagedelete

Declaration information

*Please download the company statement sign and seal as required, and upload the scanned copy:

Updating files

Previouspage next page

Declaration of the manufacturer

We hereby declare that the information and related materials submitted by this manufacturer are true and complete, and can meet the relevant regulations of China and _____ (name of exporting country or region) and the *Regulations of the People's Republic of China on the Registration and Administration of Overseas Manufacturers of Imported Food*.

Name and position of the legal representative of the manufacturer

Signature and seal of the legal representative

Date :

Attachment information

[front page](#)[Registration application](#)[Fermented wine and its blended wine](#)[Basic information of the company](#)[Production related information](#)[Enterprise statement](#)[Attachment information](#)[Temporary storage](#)[delete](#)

Attachment information

Tip: You can upload files with the suffix named .jpg|*.jpeg|*.gif|*.png|*.bmp|*.pdf, and the size of a single file cannot exceed 4M.

Serial nu...	Attachment type	Must pass	file name	operate
1	Licensed production certificate issued by the competent authority of the country where you are located	Must pass	-	-
2	Product photos to be exported to China	Must pass	Must upload -	-
3	Enterprise statement	Must pass	-	-
4	Processing flow chart	Not required	→ Not mandatory	-

[Previous page](#)[Preview](#)

Email contact@chemlinked.com for manufacturer registration.

Duties for each party

 **Manufacturer**

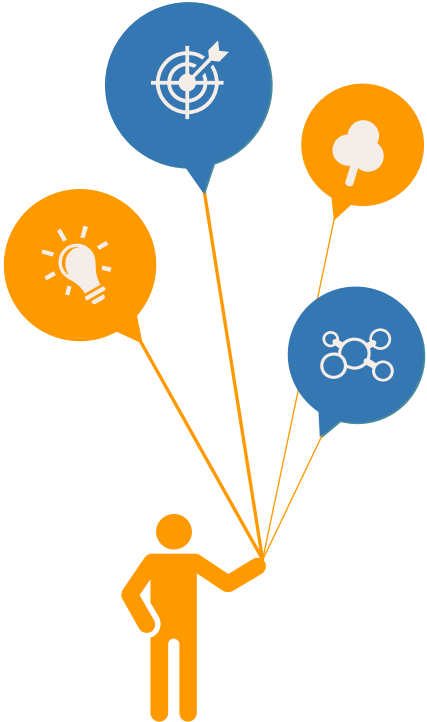
- Get GACC registration approval
- Establish effective food safety and sanitation system & protection system
- Meet regulations in China
- Non-compliant items were found by itself — suspend — rectify (will not influence the registration qualification)

 **Overseas competent authority**

- Review manufacturers before the recommendation
- Recommend
- Effective supervision
- Urge manufacturers to be compliant

 **Applicant (Manufacturer or authority)**

- be accountable for truthfulness, completeness, and legality of the submitted materials





T04

Other importation requirements worth attention — Decree 249

Other importation requirements worth attention

GACC Decree 249 — Administrative Measures on Import and Export Food Safety

Labeling

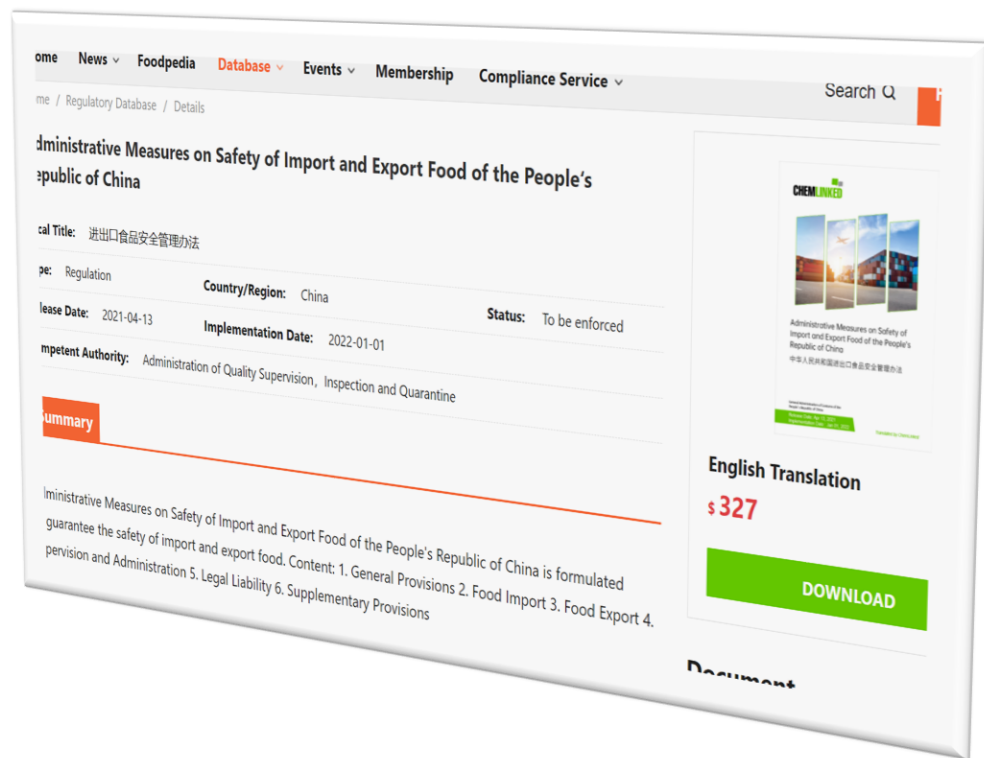
- Chinese label must be directly **printed** on the minimum sales packaging of **imported health food and food for special dietary uses**. Affixing label is not allowed.
- Foods for special dietary use: infant formula, FSMP products, supplementary foods for infants and young children, complementary foods nutritional supplements, sports nutrition, etc.
- Special labeling requirements for aquatic and meat products (dual language)

Food safety management system inspection

- The inspection requirements of food safety management system in overseas countries are detailed (article 12-16)

Reference Link

1. **GACC Decree 248** — Regulations on the Registration and Administration of Overseas Manufacturers of Imported Food ([link](#))
2. Interpretation of GACC Decree 248 ([link](#))
3. **GACC Decree 249** — Administrative Measures on Import and Export Food Safety ([link](#))
4. Interpretation of GACC Decree 249 ([link](#))
5. GB 7718 General Standard for the Labeling of Prepackaged Foods ([link](#))
6. QA of GB 7718 ([link](#))
7. [Guideline](#): where to download enterprise application form, checking list for competent authorities, etc.





Q&A

THANKS

lennie@chemlinked.com



LINKEDIN



WECHAT

☎ +86(0)571 8609 4444
🌐 food.chemlinked.com
✉ food@chemlinked.com