: Διεθνών Σχ
: Μελ

ΚΕΝΤΡΙΚΗ ΕΝΩΣΗ ΕΠΙΜΕΛΗΤΗΡΙΩΝ
Αριθμ. Πρωτ. : 2847
Ημερομηνία : 23/06/22

ΠΡΕΣΒΕΙΑ ΤΗΣ ΕΛΛΑΔΟΣ ΣΤΟ ΠΕΚΙΝΟ
ΓΡΑΦΕΙΟ ΟΙΚΟΝΟΜΙΚΩΝ ΚΑΙ
ΕΜΠΟΡΙΚΩΝ ΥΠΟΘΕΣΕΩΝ

ΑΔΙΑΒΑΘΜΗΤΟ
ΕΠΕΙΓΟΝ

Πεκίνο, 21 Ιουνίου 2022
Α.Π.: Φ. 2530/ΑΣ 904

Προς:
- **Κεντρική Ένωση Επιμελητηρίων Ελλάδος (μ. ημών, μ. e-mail)** (e-mail: keeuhcci@uhc.gr)
- **Πανελλήνιος Σύνδεσμος Εξαγωγέων (μ. ημών, μ. e-mail)** (e-mail: pse@otenet.gr)
- **Σύνδεσμος Εξαγωγέων (μ. ημών, μ. e-mail)** (e-mail: info@seve.gr)
- **Σύνδεσμος Εξαγωγέων Κρήτης (μ. ημών, μ. e-mail)** (e-mail: info@crete-exporters.com)
- **Ελληνοκινεζικό Επιχειρηματικό Επιμελητήριο (μ. ημών, μ. e-mail)** (e-mail: contact@chinese-center.gr)
- **Ελληνοκινεζικό Εμπορικό, Βιομηχανικό, Ναυτιλιακό & Τουριστικό Επιμελητήριο (μ. ημών, μ. e-mail)** (e-mail: info@chinese-chamber.gr)
- **Επιμελητήριο Ελληνοκινεζικής Οικονομικής Συνεργασίας (μ. ημών, μ. e-mail)** (e-mail: info@gcec.gr)
- **Ελληνοκινεζικό Οικονομικό Συμβούλιο (μ. ημών, μ. e-mail)** (e-mail: info@gcec.gr)
- **Ελληνοκινεζικός Οργανισμός Φιλίας και Συνεργασίας (μ. ημών, μ. e-mail)** (e-mail: grchorg@gmail.com)

Κοιν.: **Υπουργείο Εξωτερικών**
- Διπλωματικό Γραφείο κ. Πρωθυπουργού
- Διπλωματικό Γραφείο κ. Υπουργού
- Διπλωματικό Γραφείο κ. Αναπληρωτή Υπουργού
- Διπλωματικό Γραφείο Υφυπουργού, κ. Κ. Φραγκογιάννη
- Γραφείο κ. Γενικού Γραμματέα
- Γραφείο κ. Γενικού Γραμματέα ΔΟΣ & Εξωστρέφειας
- Γραφείο κ.κ. Α΄ & Β΄ Γενικών Διευθυντών
- Α9, Β1 & Β5 Διευθύνσεις
- Γραφείο Ο.Ε.Υ. Σαγκάης **(μ. ημών, μ. e-mail)**

Ε.Δ.: **Γραφείο κ. Πρέσβυ**

ΘΕΜΑ: **Εγχειρίδιο Κέντρου Επιχειρήσεων Μικρού και Μεσαίου Μεγέθους Εμπορικού Επιμελητηρίου της Ευρωπαϊκής Ένωσης στην Κίνα, για την εγγραφή εξαγωγικών επιχειρήσεων στην ηλεκτρονική βάση δεδομένων CIFER της Γενικής Διοίκησης Τελωνείων της Λαϊκής Δημοκρατίας της Κίνας.**

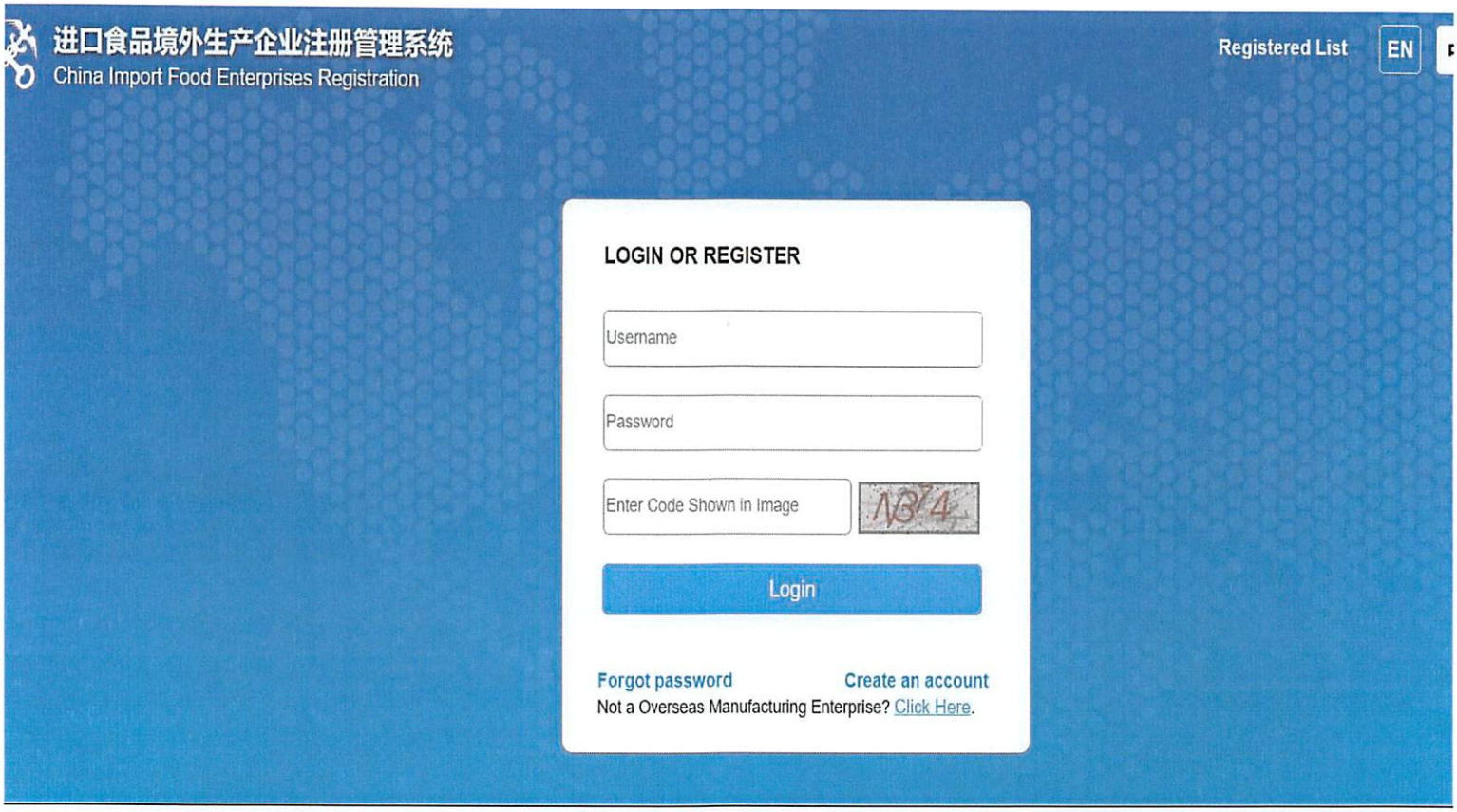
Σχετ.: Έγγραφό μας, Α.Π.: Φ. 2530/ΑΣ 264/20.2.2022 και λοιπή σχετική αλληλογραφία.

Σε συνέχεια ανωτέρω σχετικής αλληλογραφίας, αποστέλλουμε συνημμένα το εν θέματι εγχειρίδιο, το οποίο δημοσιεύθηκε στις 15.6.2022, και θα παρακαλούσαμε για την σχετική ενημέρωση των μελών σας. ✓

Ο Διευθύνων
Γεώργιος Χατζηπέτρος
Γραμματέας Ο.Ε.Υ. Α΄

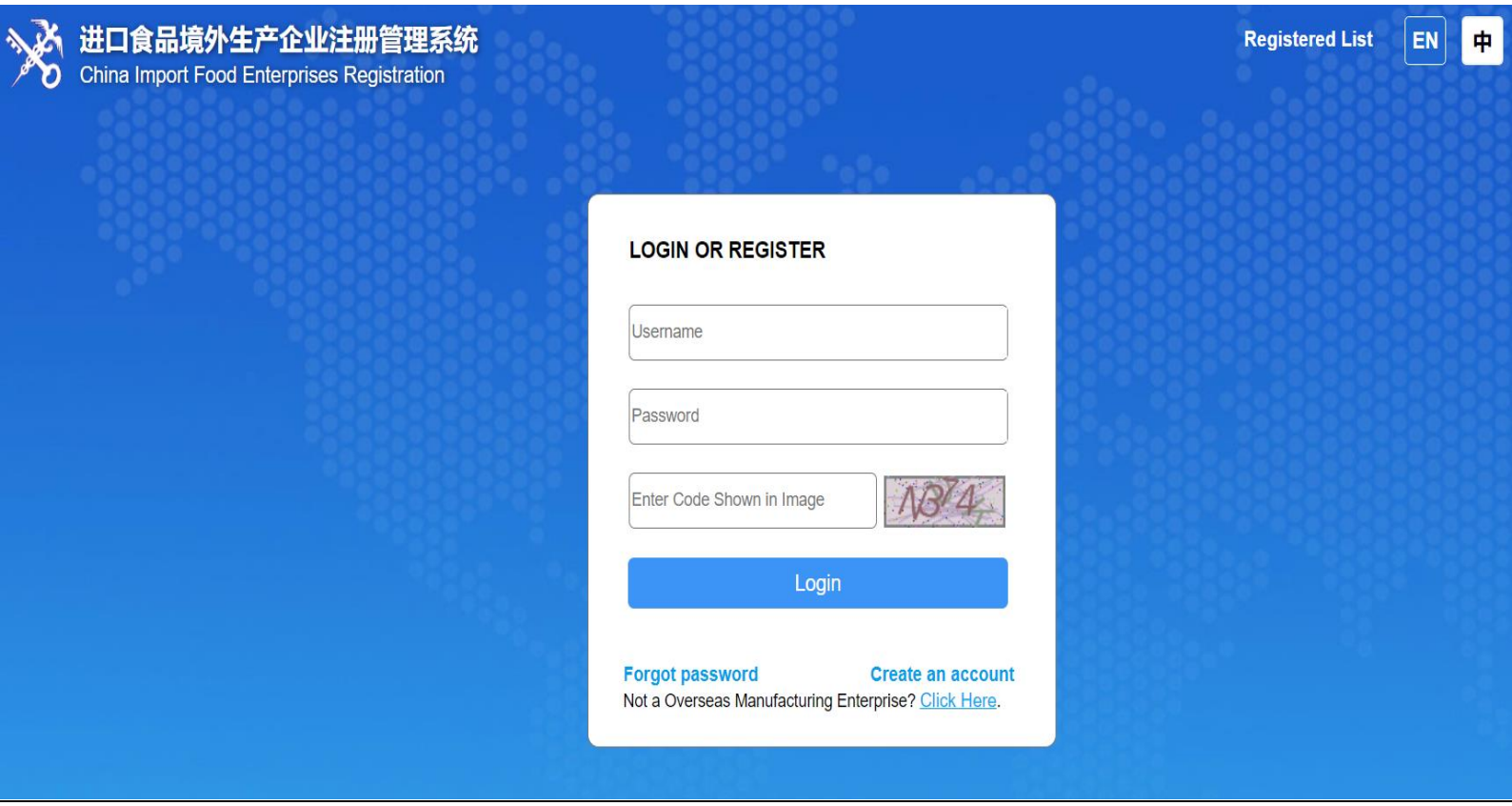
Συν.: 33 σελ.

Guidelines on mandatory GACC registration for European F&B establishments (Decree 248)



May 2022

Guidelines on mandatory GACC registration for European F&B establishments (Decree 248)



May 2022

This EU SME Centre report was written by:

Arvid Tilner: Project Assistant, EU SME Centre

Alessio Petino: Knowledge Coordinator, EU SME Centre

*This EU SME Centre report is an update of the key parts of a previous report produced in 2017, "*F&B Technical Requirements and Labelling*", particularly relating to food safety governance, GACC registration, and labelling: https://www.eusmecentre.org.cn/guideline/fb-technical-requirements-and-labelling.*

© EU SME Centre 2022

Disclaimer

This document is provided for general information purposes only and does not constitute legal, investment or other professional advice on any subject matter. Whereas every effort has been made to ensure that the information given in this document is accurate, the EU SME Centre accepts no liability for any errors, omissions or misleading statements, and no warranty is given or responsibility accepted as to the standing of any individual, firm, company or other organisation mentioned. Publication as well as commercial and non- commercial transmission to a third party is prohibited unless prior permission is obtained from the EU SME Centre.

This publication was produced with the financial support of the European Union and its contents are the sole responsibility of the EU SME Centre. The views expressed in this publication do not necessarily reflect the views of the European Union.

Contents

Executive summary **4**

1. Overview of GACC Decree 248 ..... **5**

Competent authority 5

Scope of application 5

Product categories and registration procedures 5

Other requirements: packaging and labelling 6

Significance and impact 6

2. Step-by-step guide for completing GACC registration **8**

Step 1: Determination of the risk level of the product to be exported 8

Step 2: Identification of the overseas competent authority for high-risk products 8

Step 3: Creation of account on CIFER system 9

Step 4: Completing the registration 10

Step 5: Application status 13

Step 6: Approval of the registration 14

Step 7: Modification, extension or cancellation of the registration 15

3. Requirements on packaging and labelling **17**

General rules and standards on packaging and labelling 17

Additional requirements for specific high-risk product categories 18

Additional requirements relating to COVID-19 20

4. FAQs on GACC registration **21**

Annex: List of food safety competent authorities in EU Member States **28**

Executive summary

China's food safety governance has been significantly strengthened over the past years.[1] The overarching governing framework is represented by the *Food Safety Law of the People's Republic of China (Second Revision)*[2] and the more detailed *Implementing Regulations of the Food Safety Law*.[3] The two documents set out comprehensive and clear requirements for the production, import, export, sale, recall, and traceability of food products in China, aimed at establishing a whole-process supervision and control system.

A key element outlined by the *Food Safety Law* is that all F&B operators shall be liable for the safety of F&B products that they produce or distribute. On this basis, in April 2021, the General Administration of Customs of the People's Republic of China (GACC) issued the *Administrative Provisions on Registration of Overseas Manufacturers of Imported Foods*, which officially came into force on 1 January 2022.[4] The Provisions, commonly referred to as GACC Decree 248, stipulate that **all overseas establishments that produce, process, or store any type of F&B product that is exported to China must register through a dedicated platform, obtain a registration code from GACC**, and display it on the product's inner and outer packaging – before the product is exported to China. Together with another GACC regulation which came into force at the same time – GACC Decree 249 – the regulation significantly increases the responsibility and liability of overseas F&B establishments and of the food safety competent authorities in their countries.

However, the ambition to achieve the objectives of GACC Decree 248 has not always been accompanied by adequate awareness-raising efforts to instruct the overseas F&B establishments concerned. **Many doubts, uncertainty, and questions on different aspects of the registration process continue to exist** even after a few months of enforcement; these are often combined with IT bugs or sudden changes in the registration system which are rarely explained. A frequent outcome is rejection of applications submitted by overseas F&B establishments, in turn making it temporarily impossible for them to export their products to the Chinese market. Many have reached out to the EU SME Centre seeking assistance with their specific cases.

For this reason, these guidelines were produced to assist European F&B establishments to complete the mandatory GACC registration process. In the first section, an overview of the key elements of GACC Decree 248 is provided, focusing in particular on the scope of application, different risk levels of F&B categories, packaging requirements, as well as overall significance and impact. The second, core section illustrates the **seven key steps that European F&B establishments must follow to complete the GACC registration process**, supported by screenshots taken directly from the system as well as tips on how to avoid mistakes. The third section focuses on the new requirements to display the GACC registration code on the packaging and labelling of different product categories. The fourth section provides a summary of **Frequently Asked Questions** (FAQs) **that the EU SME Centre has received from European F&B establishments**, and which were addressed by a team of experts – often after several rounds of calls with GACC operators. Finally, a **list of the food safety competent authorities in EU Member States is provided**, as close coordination with them will be required for certain F&B product categories.

---

[1] *For a detailed overview of China's food safety governance, its evolution over the years, as well as its commonalities and differences with the EU food safety system, see a dedicated publication completed in 2018 with the financial support of the EU: https://op.europa.eu/en/publication-detail/-/publication/3624d0f7-736a-11e8-9483-01aa75ed71a1 (accessed: 11 May 2022).*

[2] *The Law was revised in 2015, full text in Chinese available at: http://www.gov.cn/zhengce/2015-04/25/content_2853643.htm (accessed: 26 April 2022); an unofficial translation in English is available at: https://www.fas.usda.gov/data/china-china-s-food-safety-law-2015 (accessed: 26 April 2022).*

[3] *Issued in 2019, full text in Chinese available at: http://www.gov.cn/zhengce/content/2019-10/31/content_5447142.htm (accessed: 26 April 2022); an unofficial translation in English is available at: https://www.fas.usda.gov/data/china-china-implements-food-safety-law-implementing-regulations (accessed: 26 April 2022).*

[4] *Full text in Chinese available at: http://www.customs.gov.cn/customs/302249/2480148/3619591/index.html (accessed: 26 April 2022); an unofficial translation in English is available at: https://www.fas.usda.gov/data/china-overseas-facilities-registration-regulation-decree-248 (accessed: 26 April 2022).*

1. Overview of GACC Decree 248

This chapter will provide a detailed overview of the key requirements and provisions of the *Administrative Provisions on Registration of Overseas Manufacturers of Imported Foods* – commonly referred to as GACC Decree 248. All European establishments that produce, process, or store F&B products that are exported to China must abide by its requirements. Step-by-step guidelines and tips will be provided in the second chapter.

Competent authority

According to Article 3, GACC is the agency responsible for supervising and managing the registration of overseas establishments producing, processing, or storing F&B products exported to China.

Specifically, as part of the registration management process, GACC conducts risk analysis to determine the registration method that overseas establishments must follow; it negotiates the requirements and application materials with the competent authority of the country or region where the establishment is based (see chapter 2.1 of these guidelines); and reviews the applications submitted by overseas establishments through the dedicated system, document examination, video checking, on-site reviewing – or a combination of these. If approved, GACC will assign a China registration code to the registered overseas manufacturers of imported food, and uniformly publish the list of registered overseas manufacturers of imported F&B products.

Finally, in addition to the registration management, GACC is also accountable for the inspection and quarantine management of overseas manufacturers of imported food and beverages.

Scope of application

According to Article 2 of GACC Decree 248, all overseas establishments producing, processing, or storing F&B products exported to China are required to register on a dedicated system before the products arrive in the Chinese market. While overseas establishments producing, processing, or storing food additives or other food-related products (such as packaging) are not required to complete the registration.

According to Article 50 of the *Food Safety Law*, 'production' and 'processing' refer to the transformation of food and raw materials, or semi-finished products, into products suitable for human consumption, through labour, machinery, energy, or similar processes.

It is noteworthy that, in the past, the requirement to register and be officially approved by GACC was applicable only to four high-risk product categories, meat, dairy, aquatic and bird's nest products. However, GACC Decree 248 extended it and made it mandatory for all food product categories, including low-risk ones.

Product categories and registration procedures

Articles 6 and 7 of GACC Decree 248 distinguish between two product categories: so-called 'high-risk categories' and so-called 'low-risk categories', each with its own registration procedure:

- (so-called) High-risk product categories: full authority registration procedure. Registration through recommendation of the competent authority of the country/region where the establishment is based
- (so-called) Low-risk product categories: 'fast-track" self-registration procedure: Individual application directly to GACC

An overview of the 18 specific product categories considered high-risk is provided on the next page. These include four product categories that were already considered high-risk and requiring registration (meat, dairy, aquatic and bird's nest products) and 14 "new" product categories. Overseas establishments of high-risk products must first apply to the competent authorities in the country/region where they are located. The authorities, in turn, verify the establishment's compliance with China's food safety requirements and release a username and password to login on GACC's registration platform. The establishment will then complete the registration by submitting all the relevant documentation and information required through the platform. GACC will then conduct a substantive technical review, including document examination, video checking, on-site

reviewing, or a combination of these. If the assessment and examination results are positive, GACC will issue the 18-digit registration number and notify the competent authority in the country where the establishment is based. The whole registration process is relatively complex and lengthy.

Category	Products	Registration Procedure
High-risk categories (18 categories)	(i) Meat and meat products (ii) Casings (iii) Aquatic products (iv) Dairy products (incl. infant formula) (v) Edible bird's nests and bird's nest products (vi) Bee products (vii) Eggs and egg products (viii) Edible fats and oils (incl. oilseeds) (ix) Stuffed pasta products (x) Edible grains (xi) Milled grain industrial products and malts (xii) Fresh and dehydrated vegetables, dried beans (xiii) Seasonings (xiv) Nuts and seeds (xv) Dried fruits (xvi) Unroasted coffee beans and cocoa beans (xvii) Food for special dietary purposes (xviii) Health food (functional food/supplements)	Manufactures should be recommended by the competent authorities to GACC for registration. Manufacturers first apply to the competent authority and obtain from them a username and password to login on **GACC's CIFER platform**. They will then fill in the necessary information and documents.
Low-risk categories	All other F&B product categories	Manufactures (or agents) can directly apply for the online registration to GACC, through the **GACC's CIFER platform**.

Other requirements: packaging and labelling

After the registration application is approved by GACC, an 18-digit code will be obtained (formed by: C + 3 digits for country code, 4 digits for product category code, 6 digits for date, and 4 digits as a serial code).

According to Article 15 of GACC Decree 248, the code must be marked on both the inner and outer packaging of the relevant product exported to China. 'Inner packaging' refers to the packaging of the minimal sales unit of the product, while 'outer packaging' refers to the external packaging used for the transportation of the product from the exporting country to China.

It is noteworthy that the GACC registration code for food for special dietary purposes must be printed on the inner packaging – and not stuck on a label as it is possible for all the other F&B product categories. More details on packaging and labelling requirements will be provided in chapter 3 of these guidelines.

Significance and impact

The fundamental purpose of GACC Decree 248 is to enhance and ensure the safety of F&B products imported into China, and thus the health of Chinese consumers – as mandated by the country's *Food Safety Law* and its implementing rules. All the registration requirements and application materials to be submitted by overseas establishments shall be interpreted in this way.

GACC Decree 248 – as well as other relevant regulations such as the *Measures of the People's Republic of China for the Administration of Import and Export Food Safety*, commonly referred to as GACC Decree 249 [5] – marks a clear shift in China's approach to 'source management' of imported F&B products, at the same time extending it to all F&B product categories and not only high-risk ones as in the past (meat, dairy, aquatic and

[5] *Full text in Chinese: http://jckspj.customs.gov.cn/spj/zcfg18/bmgz91/3625580/index.html (accessed: 26 April 2022); an unofficial translation in English is available at: https://www.fas.usda.gov/data/china-administrative-measures-import-and-export-food-safety (accessed: 26 Apr 2022).*

bird's nest products). In doing so, the responsibility and liability of overseas establishments are increased in terms of authenticity of the information submitted during the registration process, production conditions, as well as rectification measures and voluntary suspension of exports when potential issues arise. At the same time, clear requirements are also set for the competent authority where the overseas establishment is based, in terms of overseeing and ensuring compliance, adopting rectification measures, and maintaining prompt communication with GACC.

2. Step-by-step guide for completing GACC registration

The objective of the application process for overseas manufacturers is to receive, from GACC, a registration code to be displayed on the F&B product to be exported to China. If a product arrives in China without having successfully completed the registration, or if the registration code is not displayed on the product in accordance with the requirements of GACC Decree 248 and other national standards, the customs at the port of entry in China will not clear the product.

Therefore, GACC has created a dedicated system to obtain the registration code: the *China Imported Food Enterprise Registration* (**CIFER**). CIFER is accessible through GACC's Single Window platform, as well as through the following link: https://cifer.singlewindow.cn.

This chapter illustrates seven necessary steps that all overseas establishments must follow to obtain the GACC registration code and to be able to export their F&B products to China. Chapter 4 of these guidelines will include a list of FAQs that the EU SME Centre has received from EU F&B producers about specific circumstances or issues encountered during the registration process.

Step 1: Determination of the risk level of the product to be exported

As there are two different registration methods for overseas establishments, the first step is to identify the **risk level – according to GACC Decree 248 – of the F&B product** to be exported to China. Establishments producing the so-called high-risk products (18 categories) cannot complete the registration individually but must be recommended by their competent authority (see step 2); whereas establishments producing all other categories of low-risk products can apply individually for self-registration (go directly to step 3).

A single manufacturing establishment can apply for the registration of multiple product categories, following the corresponding registration method depending on the risk level of the product.

Step 2: Identification of the overseas competent authority for high-risk products

If a product falls within the category of high-risk products, the overseas establishment must identify and contact the **competent authority overseeing the corresponding F&B product in its country**. The competent authority shall, in turn, conduct a preliminary review of the overseas establishment and its products to be exported to China, specifically inspecting and verifying the following elements:

- The country/region where the establishment is located meets the relevant requirements of GACC;
- The establishment's qualification is legally valid and controlled in their country/region;
- The establishment's safety and health management situation should meet different requirements. Firstly, its production and export should meet the requirements of its country/region; secondly, for products exported to China, the establishment must also comply with relevant Chinese laws, regulations, and national food safety standards;
- The establishment should also comply with relevant inspection and quarantine requirements agreed between the GACC and the competent authority of the manufacturer's country/region

If the establishment meets all the above criteria, the competent authority officially recommends the establishment to GACC for registration, by submitting the following application materials:

- Letter of recommendation by the competent authority;
- List of recommended establishments and their applications for registration;
- Documents certifying the identity of the establishment, e.g. business license;
- Statement that the establishment recommended by the competent authority conforms with the requirements of the regulations and standards of the country and of China;
- Reports of examinations/inspections/reviews conducted by the competent authority to the relevant establishment(s).

If necessary, GACC may request additional documents related to the manufacturer's food safety, sanitation, and protection systems, such as floor plans of the factory/workshops/cold storage, the processing flow chart, and others.

Once GACC has received, reviewed, and approved the submitted dossier, the competent authority will receive an account and password to allow the relevant establishment(s) to login into CIFER and officially complete the registration. The whole process may take several months.

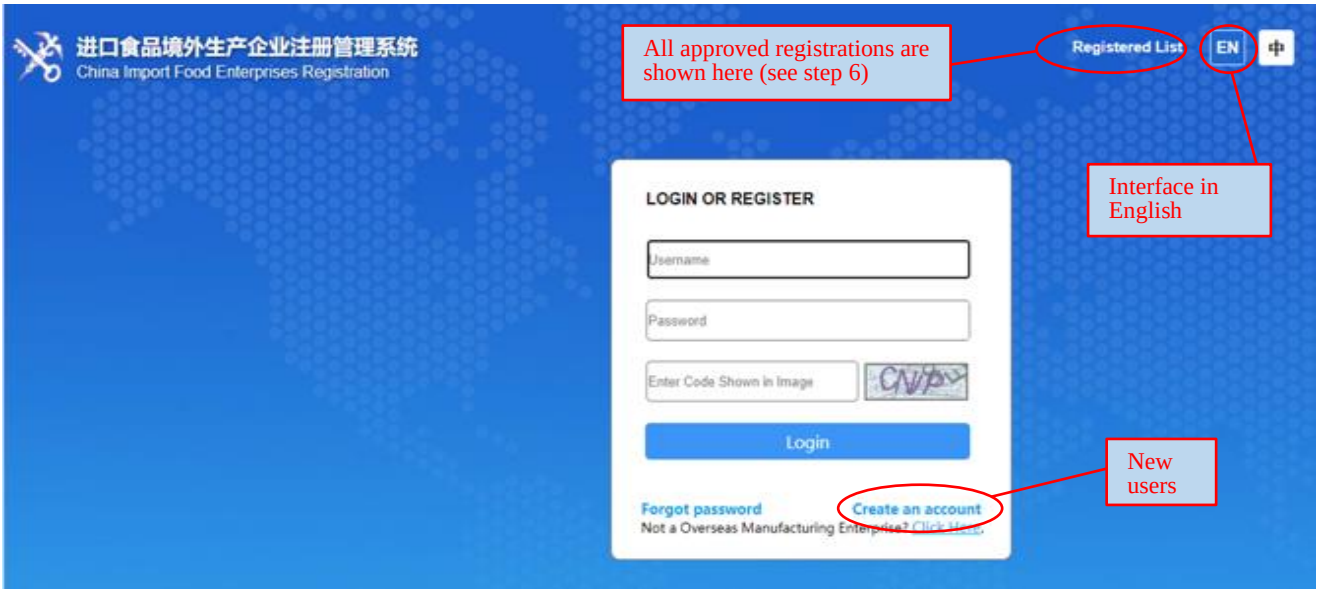
The **food safety competent authorities in the EU differ for each Member State** – sometimes different competent authorities exist for different product categories, e.g. if the product is of animal origin, if it is a food for special dietary purposes, etc. In order to facilitate EU F&B producers in the process, and based on feedback received, the EU SME Centre has collected relevant information on the competent authorities of each EU Member State, which can be found in the **Annex of these guidelines**.

Step 3: Creation of account on CIFER system

In order to submit an application for registration, overseas establishments – or entrusted third-party agencies – must create an account on the CIFER system. If the establishment has high-risk products, then it must use the account name and password received by the food safety competent authority in its home country (see step 2) to be able to login; if the establishment has low-risk products, a new account can be created easily.

Note: one account must be created for each individual establishment, even if belonging to the same company/group

Screenshot from CIFER's main page



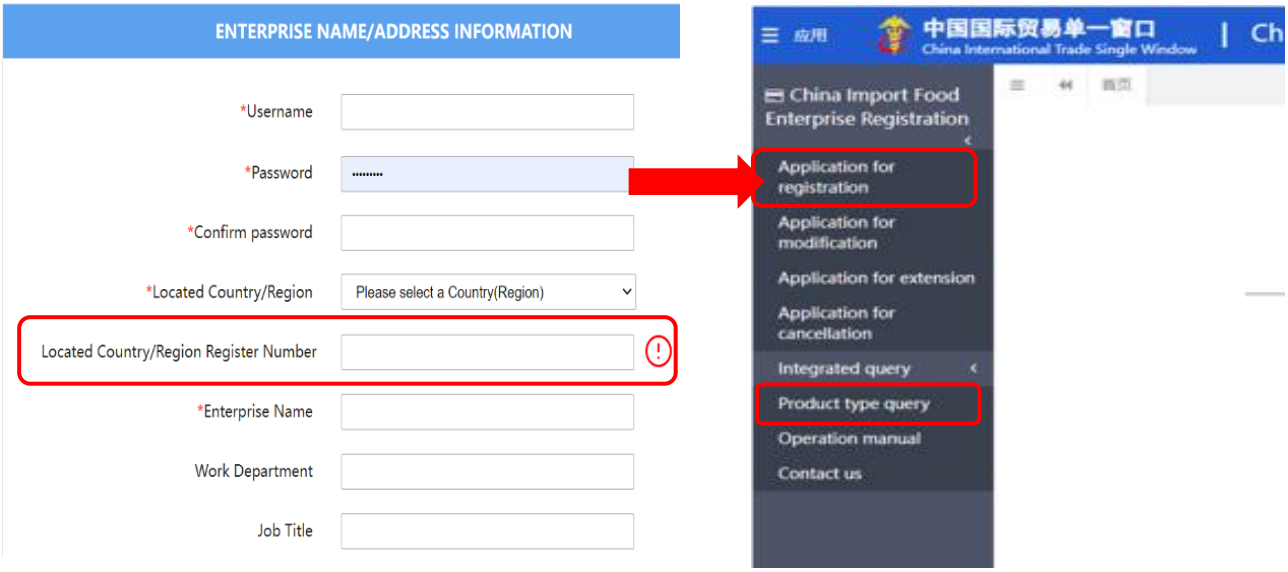
By clicking '**Create an account**', the applicant will be redirected to a page to fill out basic information about the establishment. Compulsory fields are marked with a **red asterisk** * and cover the information regarding username and password, location of the enterprise, workplace, contact person, number, email address, as well as the located country/region registration number.

Note: the basic information will be filled in automatically by the CIFER system if the establishment has logged in through an username and password received from the competent authority in the country where it is based

Among the fields to fill in, the '**Located country/region register number**' varies from country to country: it can be issued by the competent authority (for the so-called high-risk products), but can also be a business registration number, tax number, VAT number, etc.

Note: once an account is successfully created, information such as username, the country/region location, and the registration number of the country / region cannot be changed or modified. Make sure to fill in this information in a correct manner (more details in step 7)

Screenshots from CIFER: account creation and main menu



Step 4: Completing the registration

Once the user account is successfully created and activated, the applicant can access and begin the registration by clicking '**Application for registration**' on the menu bar to the left side of the page. This section in the menu bar also includes other functions (which will be introduced in the following steps), as well as the possibility to confirm the registration method to be followed – i.e., through recommendation of the competent authority or individual registration – by inserting the HS code or product name (in Chinese) of the product to be registered, and the inspection and quarantine code and name (CIQ code/name).

After beginning the application for registration, applicants must select their product category, which are sorted by their risk level – beginning with the 18 so-called high-risk categories on top of the page, and followed by the so-called low-risk product categories. Various subcategories will then be displayed under each category; clicking on them will redirect the applicant to the next page.

Note: if the applicant has created a CIFER account independently, then the high-risk categories will not be accessible; registrations for such products can be started only if the applicant has logged in with the account details obtained from the relevant competent authority in the country where it is based

Screenshot from CIFER: 'application for registration'

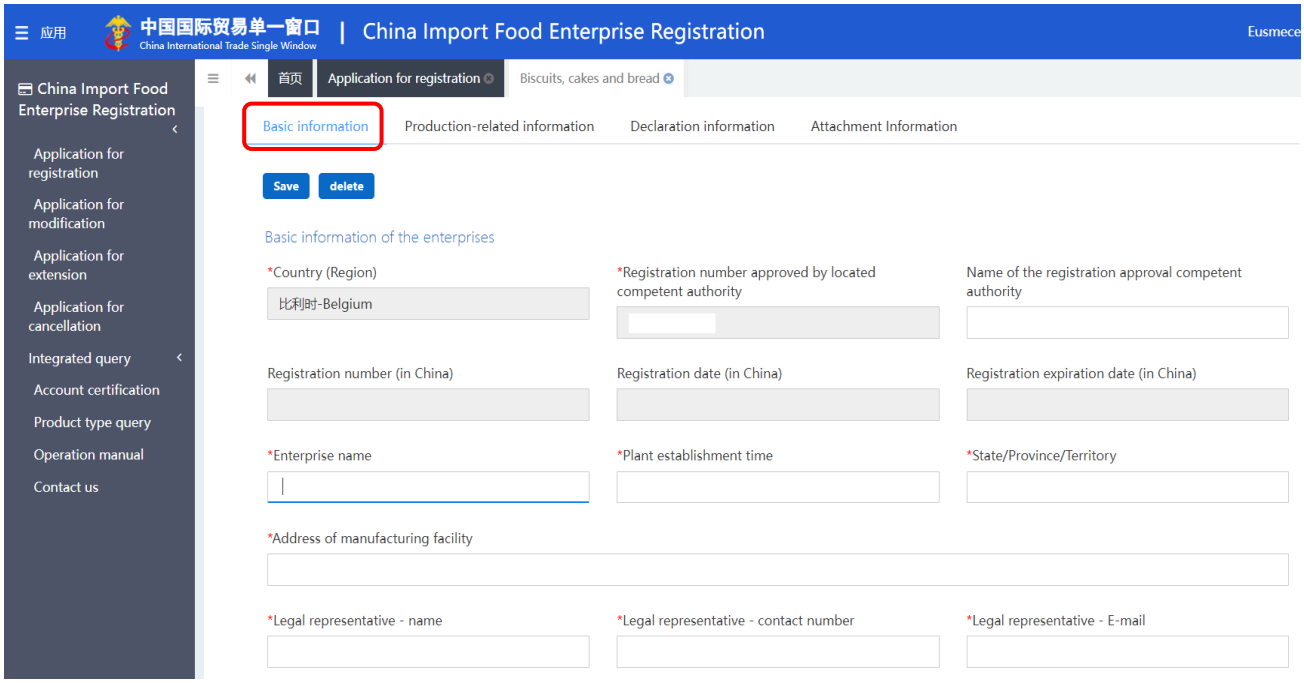
By clicking on the product subcategory, the applicant will be requested to add information about its establishment and relevant product(s). Specifically, four sections of information will need to be completed: (i) basic information; (ii) product-related information; (iii) declaration information; and (iv) attachment information. In each section, the fields marked with a red asterisk * are compulsory to fill in.

Note: if a field is not mandatory (*), it is recommended not to fill it; some product categories will require more mandatory fields to be filled in

The first section requires the applicant to fill in basic information about the establishment. The CIFER system will automatically fill out some of the requested information based on the '**Located country/region register number**' provided when creating the user account; while other fields will need to be filled in by the applicants themselves, such as the name of the enterprise, the date when the manufacturing plant was built/commissioned, the legal representative´s name, contact number, email address, etc. The production license issued by the competent authority where the applicant is based will also need to be uploaded on the system.

Note: the fields 'registration number (in China)', 'registration date (in China)', and 'registration expiration date (in China)' cannot be selected and will be automatically filled out by the CIFER system after the registration process is completed and approved by GACC

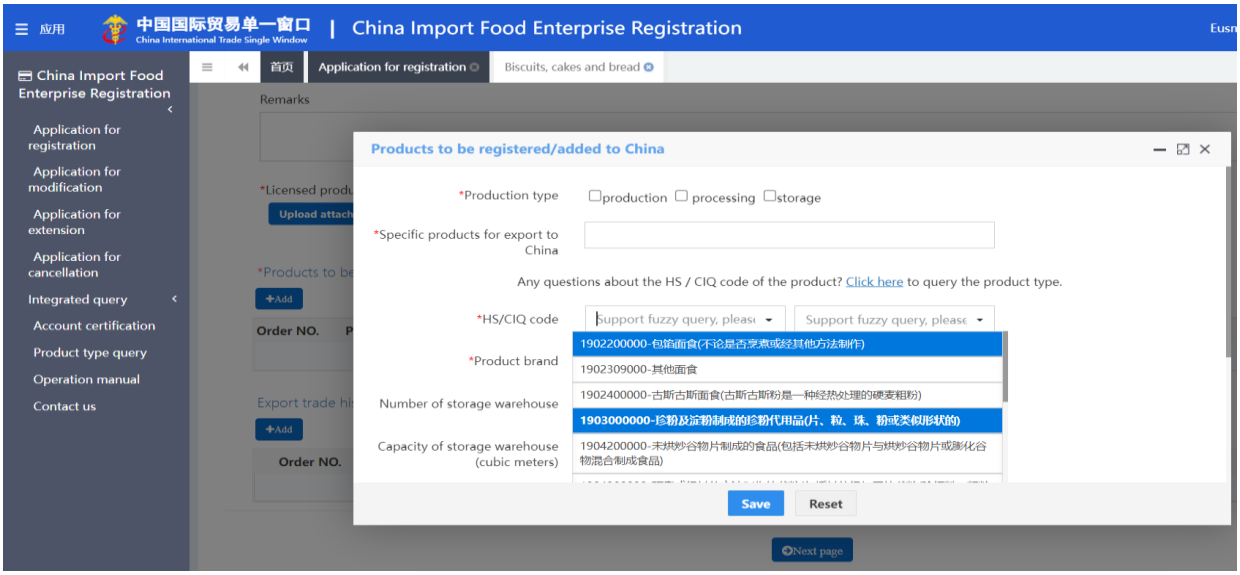
Screenshot from CIFER: filling in 'basic information'



The registration of the products to be exported to China can also be initiated in the '**Products to be registered/added to China**' section, by clicking 'Add'. All the products of the applicant must be included under each subcategory. Firstly, the applicant must choose its role in the production process of the product, i.e., 'production', 'processing' and/or 'storage'. In general, if an establishment completes the majority of the processing and finishes the product, then it can be considered as 'production'. Then, the HS code and CIQ code of the product must also be selected; in many cases, one HS code leads to two or more CIQ codes, which means that the exact one should be verified with the Chinese importer of the product. Other mandatory fields to fill relate to the annual production and processing capacity of the establishment, referring to the whole production capacity and not only that for the exports to China; if 'storage' has been selected, further information regarding the storage warehouse need to be submitted. Pictures of the product may also be uploaded.

Note: it is recommended to include all products available to the establishment, regardless of whether they are already or about to be exported to China at the time of the registration

Screenshot from CIFER: filling information regarding 'products to be registered/added to China'

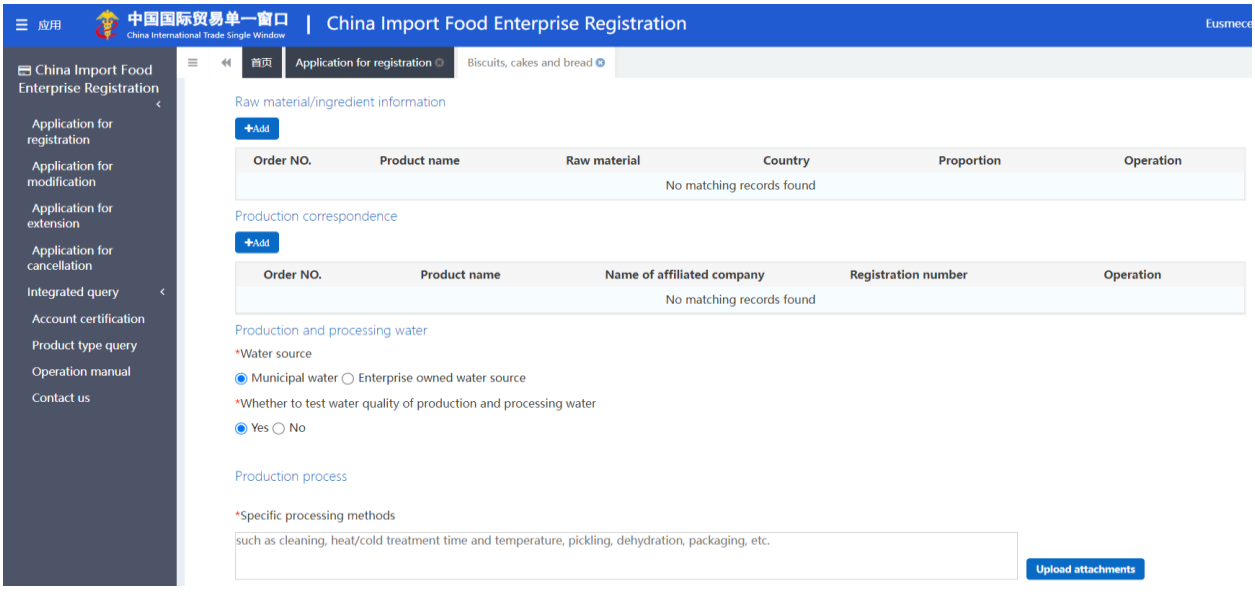


Finally, if the product had already been exported to China in the two years preceding the enforcement of GACC Decree 248 (January 2022), information on the trade history may be added in order to demonstrate more effectively the establishment's understanding and compliance with China's food safety and import-export regulations.

The next section will require the applicant to add additional product-related information, mostly relating to the production conditions and specifications. Specifically, information about the **raw materials or ingredients** of the relevant product may be added (although not mandatory), while the 'production correspondence' part requires the applicant to specify details about the **suppliers** of the raw materials/ingredients, as well as of other actors involved in the product's production process. Other parts in this section relate to the water used in the production process and the description of the production and processing techniques used for the product and the involved staff: they do not need to be too detailed, a basic description of the technical manufacturing processes will be sufficient, such as hot/cold treatment, time, temperature, pickling, dehydration, etc.

Note: a number of FAQs in Chapter 3 cover several peculiar cases related to raw materials and ingredients, for instance when one establishment does not have stable suppliers, or when raw materials are bought through brokers and not by the producers, etc.

Screenshot from CIFER: filling product-related information



The next step will be to download, sign and stamp the '**declaration of the manufacturer**', declaring that all the information filled in is true and complete. Another page will provide a summary of all the **attachments** uploaded during the registration process – which may vary depending on the specific product category registered. The final step will be to preview the application before finally submitting it to GACC for review and approval.

Note: once the application is submitted and under review by GACC, it cannot be modified, and no further products can be added until the approval process is completed

Step 5: Application status

Once the application for registration is submitted by the applicant, it will be automatically received by GACC if the product is in the low-risk category. In the case of high-risk product categories, the application for registration will be received by the food safety competent authority in the country where the applicant is based for preliminary assessment and examination, and only afterwards forwarded to GACC.

The **status of the application** can be checked by the applicant by clicking, on the left menu bar, '**Integrated query**' and then '**Application form query**'. The following statuses might appear depending on the progress of the GACC review:

Application status	Explanation
Enterprise temporarily saved	The information filled by the applicant is saved to the cloud but has not been submitted to GACC
Submitted (to the competent authority)	The application has been submitted to the competent authority for review
Submitted (to Customs)	(1) The competent authority has recommended the application to GACC (high-risk products) (2) The applicant has submitted the application to GACC (low-risk products)
Recommendation rejected	The application is returned to the applicant after being reviewed by GACC or the competent authority
Sent to Customs successfully	System processing. The application, recommended by the competent authorities or submitted by applicants, has been successfully submitted to GACC
Failed to send to Customs	System processing. The application, recommended by the competent authorities or submitted by applicants, has not been successfully submitted to GACC due to network problem or other abnormalities
Entered Customs database successfully	System processing. GACC received the data successfully
Failed to enter Customs database	System processing. GACC failed to receive the data
Accepted	The application has been accepted by GACC and is currently under review
Unaccepted	The application is returned because GACC did not accept and review it
Supplementation and correction	(1) If the submitted application does not meet the requirements, GACC will return the application and request a correction (2) The competent authority returns the application and requires the applicant to modify the application
Refused by GACC	GACC rejects the application recommended by the competent authority or submitted by the applicant
Approved	If the overseas producer of imported food meets the requirements, GACC shall approve the registration application and grant the Chinese registration number to the establishment

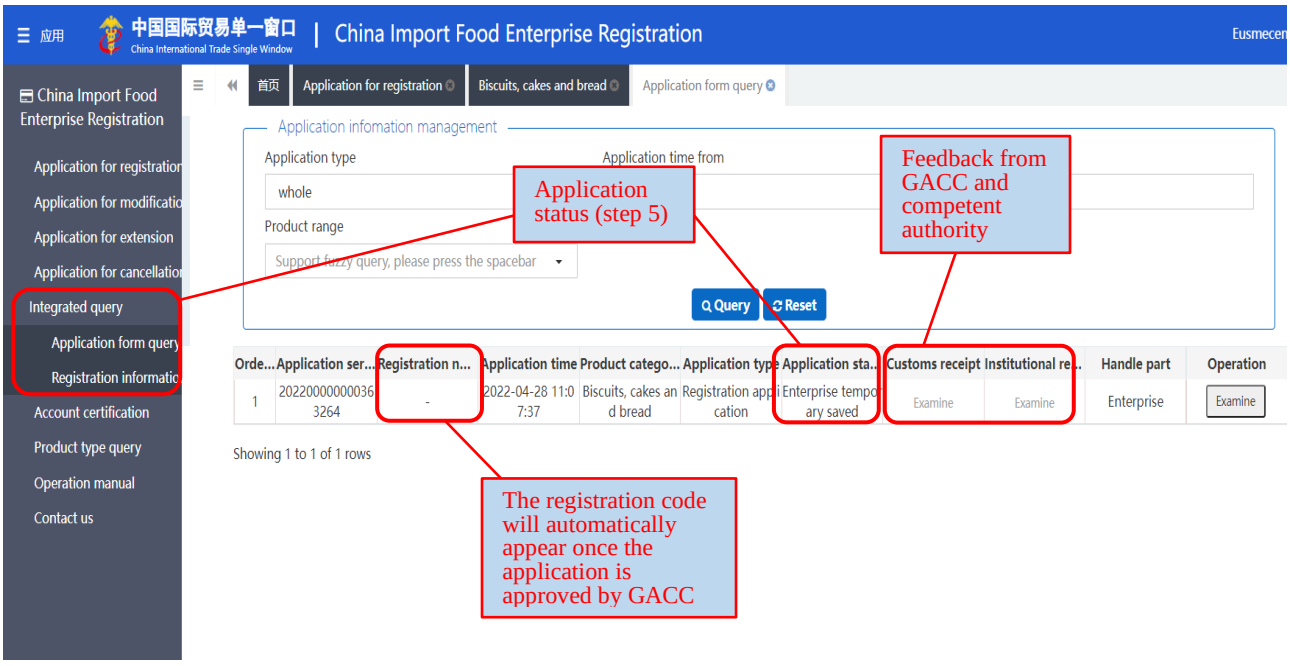
Application status	Explanation
Revoked	GACC revokes the registration in China of the registered establishment
Suspended	GACC suspends the export of food products by the registered establishment to China, until the registration requirements are met after rectifications
Rectification	If a registered overseas producer of imported food no longer conforms with the registration requirements, GACC shall request the producer to rectify within a specified period and shall suspend imports from the producer during this period. The producer shall complete the rectification within the specified period and submit to GACC a written report and a written statement confirming it conforms with the registration requirements

Source: CIFER User Manual [6]

Step 6: Approval of the registration

Once the application is approved by GACC, the **Chinese registration code** will appear under the column 'Registration number in China'. The code consists of a total of 18 digits, specifically C + 3 digits for the country code, 4 digits for the product category code, 6 digits for date, and 4 digits as a serial code. At this stage, the relevant product can be exported to China. Applications might also be modified or extended by adding new products (see step 7).

Screenshot from CIFER: filling product-related information



The code will need to be displayed on both the inner and outer packaging of the product (more details in chapter 3 of these guidelines).

All approved establishments will be included on a **dedicated register** published on the CIFER system: https://ciferquery.singlewindow.cn/. This is a public register showing basic information such as the Chinese registration code (sometimes referred to as the GACC registration number), and the validity time of the registration.

[6] *https://cifer.singlewindow.cn/deskserver/sw/deskIndex?menu_id=cifer002 (accessed: 28 April 2022).*

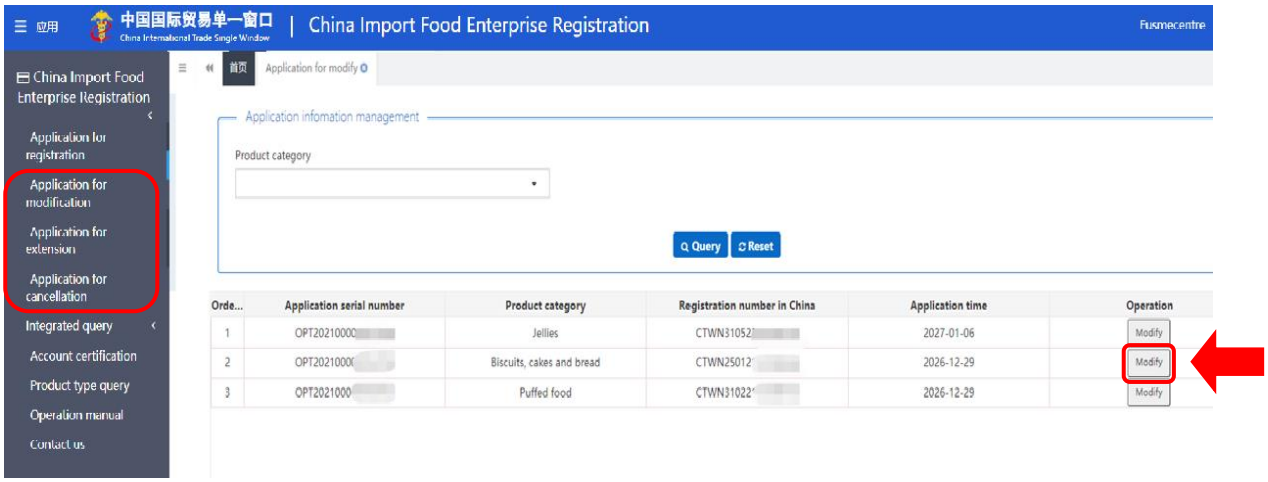
Screenshot from CIFER dedicated register of approved registrations

Step 7: Modification, extension or cancellation of the registration

After the application has been accepted by GACC and the registration code is obtained, establishments might modify or extend their registration – or even cancel it. It is possible to do so through the left menu bar, then clicking '**Modify**' on the relevant registered products. It must be noted that:

- For the so-called high-risk product categories, the application for modification or extension will first need to be reviewed by the establishment's competent authority, and then submitted to GACC;
- For the so-called low-risk product categories, the establishment may apply for modification or extension of the registration independently and directly to GACC.

Screenshot from CIFER: application for modification, extension or cancellation



Specifically, a **request for modification** must be submitted when new products need to be added to one already approved registration; when the raw materials/ingredients change; or when the basic information of the establishment change. During the process, the establishment must submit supporting materials explaining the requested changes, as indicated by the CIFER system. It is noteworthy, however, that Article 19 of GACC Decree 248 stipulates

Note: supporting materials include any document providing an explanation of the product and its characteristics. Only one attachment is allowed: all docs must be merged into a single file; a summary of all the docs in the first page will be helpful.

that, in case any of the following information change, the establishment must create a new account and reapply for a new registration from scratch – even if it had already obtained a registration code from GACC:

- Address and location of the production premises;
- Details of the establishment's legal representative;
- Located country/region register number of the establishment.

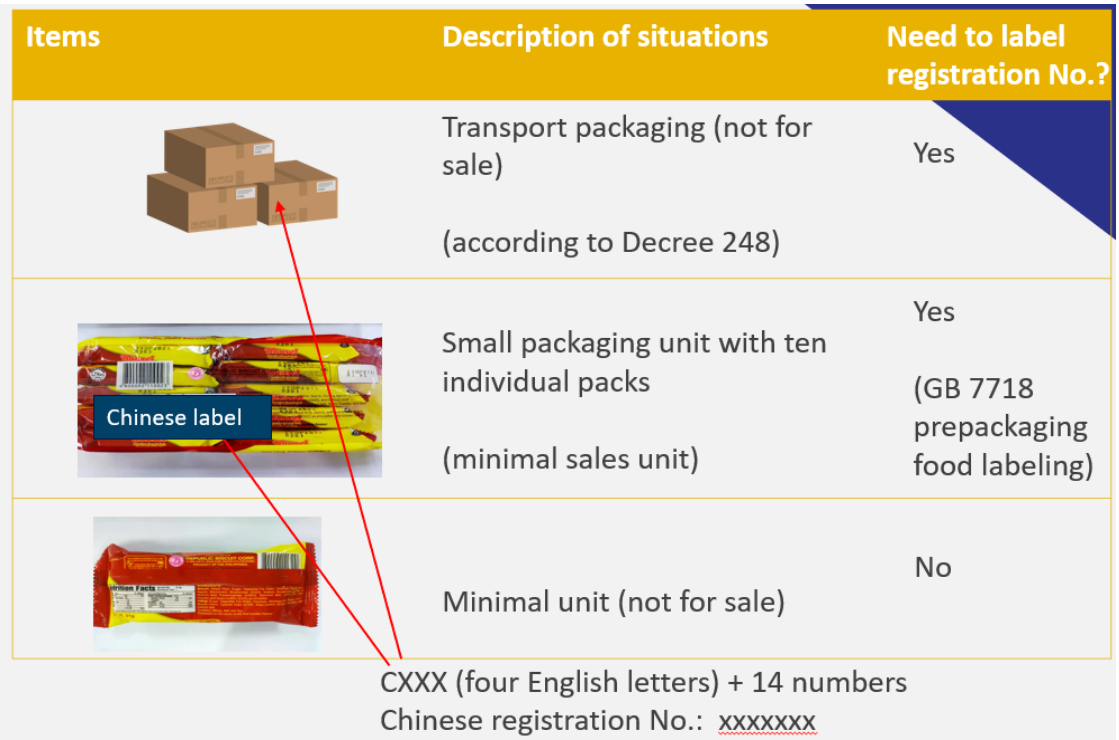
Article 16 of Decree 248 stipulates that the validity of each registration of an overseas establishment lasts for 5 years. A **request for extension** must be submitted through the CIFER system not less than 3 months and not more than 6 months before the expiration date – which can be easily tracked through the dedicated register on CIFER (see step 6). This will allow GACC sufficient time to review the information, ultimately ensuring that the overseas establishment continues to export its F&B products to China without interruption.

Finally, it is noteworthy that there may be circumstances in which the Chinese registration code is **revoked** by GACC, resulting in the impossibility for overseas establishments to continue exporting products to China. These are outlined by Article 24 of GACC Decree 248, namely:

- Severe food safety incidents of imported foods caused by the overseas establishment;
- Serious food safety problems detected in F&B products exported to China during the entry inspection and quarantine;
- Significant problems identified in the establishment's food safety and sanitation management, affecting the conformity of the F&B products with China's safety and sanitation requirements;
- The overseas establishment fails to meet the registration requirements after taking rectification measures;
- The overseas establishment provides false materials or conceals relevant facts;
- The overseas establishment refuses to cooperate with GACC in reviews and incident investigations;
- The overseas establishment leases, lends, transfers, or resells its registration number, or illegitimately claims another overseas establishment's registration number.

3. Requirements on packaging and labelling

According to Article 15 of GACC Decree 248, the Chinese registration code obtained from GACC must be clearly marked on both the **inner and outer packaging** of the relevant product to be exported to China. Inner packaging refers to the packaging of the minimal sales unit of the product, while outer packaging refers to the external packaging used for the transportation of the product from the exporting country to China. If the minimal sales unit contains several individually packaged units that cannot be sold individually, the inner packaging will then be considered as the minimal sales unit.



Screenshot from EU SME Centre hybrid workshop held in March 2022. [7]

As of April 2022, there are **no specific requirements on the font, size and format of the Chinese registration code** to be affixed on the label, besides being easily identifiable and recognisable by consumers. It is recommended to keep consistency with the rest of the information included in the label, as shown in the picture on the next page.

In addition to the 18-digit Chinese registration code on the packaging and labels, imported F&B products must also conform with the general provisions of other existing laws, regulation and food safety standards in China.

General rules and standards on packaging and labelling

In general, China's *Food Safety Law* defines packaging materials and containers as products made of paper, bamboo, wood, metal, porcelain, plastic, rubber, natural fibre, chemical fibre, or glass and used to contain food or additives, or coating in direct contact with food or additives. It also requires that food for direct consumption must be contained in small packages, or use non-toxic and clean packaging materials and containers. The respected containers for storing, transporting, and loading/unloading food must be safe, maintain the food in clean condition, and prevent food contamination.

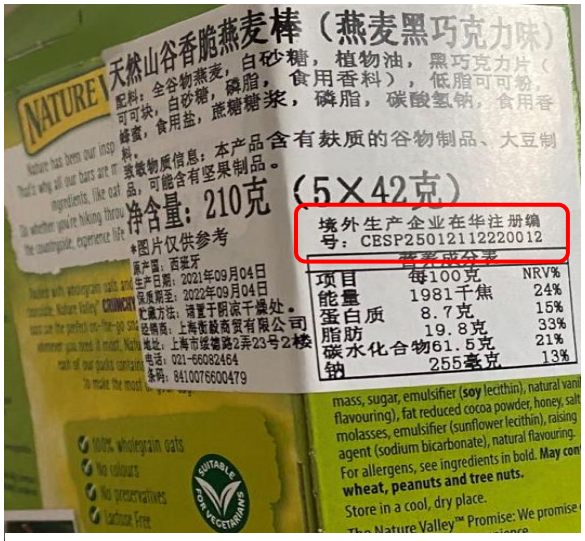
[7] *Updates on Customs and Logistics Requirements for Imported F&B Products, recording available at: https://www.eusmecentre.org.cn/event/2022-03-01/update-customs-and-logistics-requirements-imported-fb-products.*

Labelling requirements are stipulated in Chinese national standards – all of which are for mandatory implementation. For pre-packaged foods, these are:

Standard in English	Standard in Chinese	Standard Number	Effective Date
General Principles for the Labelling of Pre-packaged Foods	预包装食品标签通则	GB7718-2011	20/04/2012
Standard for Nutrition Labelling of Pre-packaged Foods	预包装食品营养标签通则	GB28050-2011	01/01/2013
Labelling of Pre-packaged Foods for Special Dietary Uses	预包装特殊膳食用食品标签	GB13432-2013	01/05/2015
General Standard for the Labelling of Food Additives	食品添加剂标识通则	GB29924-2013	01/06/2015

The content of the labels must be legal, true, complete, accurate, and consistent with the information provided during the GACC registration process in the CIFER system. Standard Chinese characters must be used, with the only exception of trademarks and details regarding the manufacturer and their premises. Labels might be either printed on an ad hoc packaging realised for the Chinese market; or stuck on the original packaging (except for health foods and special dietary food products, see next section). The content of the label shall include:

- Product name, specification, net content, and production date;
- Table of ingredients or formulation;
- Name, address, and contact details of the manufacturer and/or the local distributor;
- Shelf life, date of production, or expiration date;
- Code of product standard(s);
- Storage requirements;
- **Chinese registration code obtained from GACC**;
- Warning of allergens;
- Other information for specific products required by laws, regulations, or food safety standards, e.g. for infant formula and products derived from agricultural biotechnology



Example of Chinese registration code (in red) on the label of an imported pre-packaged food from Spain

It is noteworthy that, by the end of April 2022, some of the above national standards were currently under revision; updated versions and requirements are expected to be published in the following months.

Additional requirements for specific high-risk product categories

Additional packaging and labelling requirements must also be followed for certain high-risk product categories, as stipulated by **GACC Decree 249** (see footnote n. 5), which was published and came into force simultaneously with GACC Decree 248. Specifically, these additional packaging and labelling requirements are stipulated in Art. 30 of GACC Decree 249.

Fresh and frozen meat products

For fresh and frozen meat imports, the inner and outer packaging must have labels in Chinese and English, or in Chinese and the language of the exporting country/region; and must be securely fixed, clear, and easily recognisable. Both the inner and outer labels must include the following content:

- Country or region of origin;
- Product name;
- Registration number of the manufacturer;
- Production batch/lot number.

At the same time, the outer packaging must also bear the following information in Chinese:

- Specification;
- Place of origin (detailing country, province, and city);
- Place of destination (clearly marking 'People's Republic of China');
- Date of production;
- Shelf life;
- Storage temperature;
- Official inspection and quarantine mark of the exporting country (region).

Aquatic products

For aquatic product imports, the inner and outer packaging must have labels in Chinese and English, or in Chinese and the language of the exporting country/region; and must be securely fixed, clear, and easily recognisable. The label must include the following content:

- Commodity name and scientific name;
- Product specifications;
- Date of production;
- Batch number;
- Shelf life and storage conditions,
- Production methods (ocean catch, freshwater catch, or aquaculture);
- Production area (marine fishing area, freshwater fishing country or region, country or region where the aquaculture products come from);
- The name/registration number/address (specific city/province/state) of all involved manufacturing and processing facilities (including fishing vessels, processing vessels, transport vessels, and independent cold storage);
- Place of destination (clearly marking 'People's Republic of China').

Health food and food for special dietary purposes

Health food refers to edible products with specific health functions or to supplement vitamins and minerals. Therefore, its main function is to help a person to regulate its body, rather than having medical effects such as curing diseases; at the same time, health food must not produce any acute, or chronic harm to the human body.

Food for special dietary purposes refers to edible products that are specially processed or formulated to meet special physical or physiological conditions, and to meet special dietary needs under conditions such as diseases and disorders. The nutrition and content of other nutrients of this type of food are significantly different from comparable ordinary foods. Special dietary foods include formula foods for infants and children, complementary

foods for infants and children, formula foods for special medical purposes, and other special dietary foods (including complimentary food supplements, sports nutrition foods, and other special dietary foods with corresponding national standards).

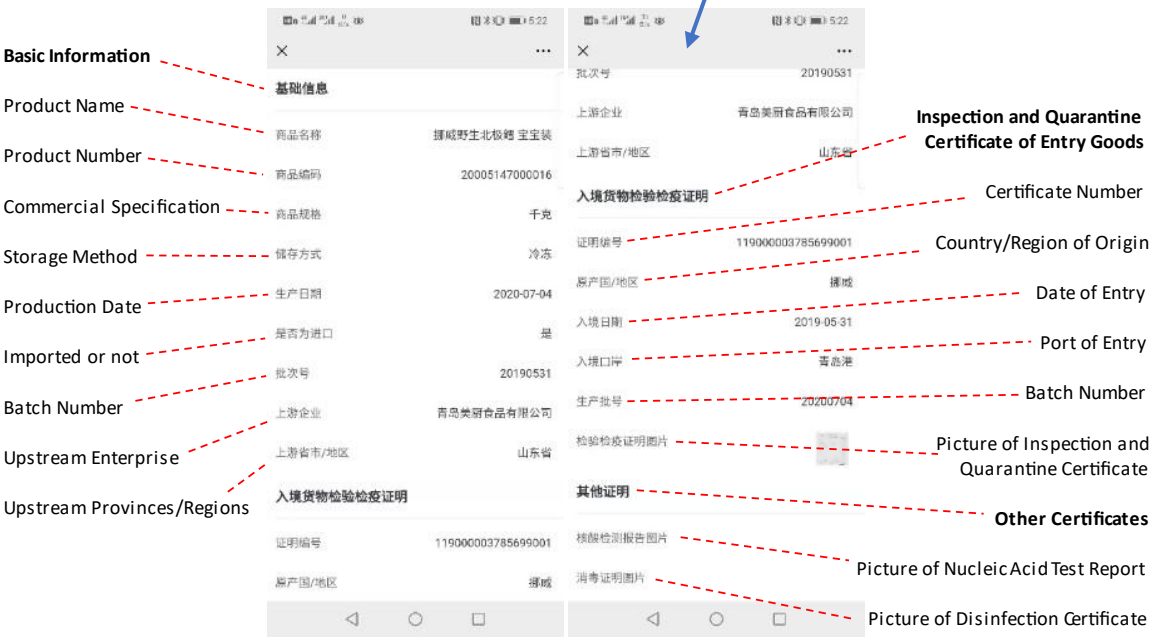
As mentioned before, unlike other product categories, the labels of health foods and food for special dietary purposes cannot be stuck on the product's original packaging, but must be printed on the minimum sales packaging.

At the same time, the label must indicate the suitable groups for the product and indicate the functions as well as highlight the functional and significant ingredients and their content. Food for infants additionally needs to indicate the age range. It is important to mention clearly that labels and instructions do not involve any information implying the prevention or treatment of diseases.

Additional requirements relating to COVID-19

Imports of food and beverage products have suffered significantly during the pandemic, particularly cold-chain foods as they have regularly been associated with imported COVID-19 cases in mainland China. This led to a variety of prevention measures being adopted, such as the tightening of inspection and quarantine requirements for imported food products (COVID-19 tests and disinfection are now required for imported food products) and cold chain products being required to display a QR code on the product.

Scanning the label reveals details of the origin of the products as well as information related to the time of import, where it entered customs and in which batch. Additional information about the product is available and the test certification ID numbers are listed to ensure the safety of the product.



4. FAQs on GACC registration

This section includes a list of Frequently Asked Questions (FAQs) received by the EU SME Centre from EU F&B producers and business associations, between November 2021 and April 2022. These were **answered after analysis and consultation with relevant industry professionals and GACC operators**.

The answers are based on the experience, good practices and practical interpretation of relevant industry practitioners; **they do not constitute in any way a legal advice, and may be subject to different interpretations**. At the same time, new changes, additions and adjustments are regularly introduced by GACC on the CIFER system – solving existing issues and sometimes introducing new ones. Therefore, the aim of the FAQs in this section is to provide general guidance on the myriad of cases and peculiarities that may affect EU F&B producers, reflecting the situation as of April 2022.

A total of 20 FAQs are included, grouped under seven main topics:

Topic	FAQ
Registration of so-called high-risk products	*Who is the 'competent authority' in my country that I should approach for completing the GACC registration? How does the registration process work?*
	Our establishment has already been reviewed by our competent authority in our home country, and obtained a username and password to login into the CIFER system. However, after filling in the details, the application cannot be submitted as GACC has not yet officially approved our competent authority for our product category. What should be done?
	We have submitted all the necessary registration documents to our competent authority, but after three months we still have not received a GACC registration code. We contacted again our competent authority and they have not received feedback from GACC; we went to check on the CIFER system's register of enterprises but our establishment is not there. What should be done?
Raw materials and suppliers	*Our company does not have a regular supplier of raw materials, we change them constantly. How do I fill in the relevant information in the system?*
	Our company purchases raw materials from a broker, not from the direct producer. How do I fill in the relevant information in the system?
	Our company is a trading company that only exports finished F&B products to China. The finished products are produced by several other suppliers worldwide. Do all the suppliers need to complete GACC registration? Which GACC registration code should be displayed on the finished product's package?
Product produced in different EU countries or facilities	*My product is partially made in one country at one location, and finished in another country at another location, which enterprise should I register in the manufacturer's registry database?*
	Company A buys raw materials, and then outsources the entire production of the product to another establishment (belonging to another company B) in the same country. On the product packaging, it is specified that the product is packaged at the address of company B, which of course is different than that of company A; but company A still owns the brand and trademark of the finished product. Should company A or company B register with GACC?
	Our company operates two different establishments – for both of which the GACC registration was completed. However, we received the same GACC registration code for two different establishments: is this normal?
F&B producers vs exporters	*Should I register with GACC if my company only exports the F&B product, but I am not the manufacturer of the product?*
	Our trading company was already registered as an overseas exporting company before the entry into force of GACC Degree 248. Should we register again?

Topic	FAQ
F&B storage enterprises	*Our establishment is responsible for the storage of F&B products, and not for the production of F&B products. Should we still register through the CIFER system?*
	How is the term 'storage enterprise' defined? We have a warehouse where we store finished products waiting to be shipped to China, do we have to register this facility on the CIFER system?
	Our product is produced by our establishment, but it is stored by another establishment – both of which have already obtained a GACC registration code. Which of the two establishments' codes should be affixed to the product's packaging? Or maybe both codes should be affixed?
Fill/edit the registration	*In the EU, business identity documents are often in the local languages and not issued in English. Is it still ok?*
	Our GACC registration was approved, how can I add new products now?
	We want to add new products to a registration which has already received GACC registration code. What attachments should be submitted in the 'Supporting materials to modify information' section?
	Our application was successfully approved by GACC, but we realised that the basic information of our establishment is wrong, specifically we inserted the name of the city where we are based as the enterprise name. Can it be changed?
Automatic changes in already approved registrations	*Our establishment has already successfully registered several products and obtained the GACC registration code. However, after a while, some of the products successfully registered do not appear anymore in our account – while in the past they did. What is this about?*
	A new section 'Account Certification' appeared in our account, with certain information already pre-filled automatically by the system. However, some information are wrong, for instance in the 'enterprise name' field the name of the city appears. How to deal with this?

If you have any questions or doubts about your specific case, please feel free to contact the EU SME Centre through our **Ask the Expert function**: www.eusmecentre.org.cn/expert. Our experts will provide a detailed answer for free, within a couple of working days.

GACC has also established a **dedicated hotline** for technical and operational issues, available in Chinese only and from mainland China: 12360 (extension number: 2). A **functional mailbox** was also established by GACC's Import and Export Food Safety Bureau to respond to any matters related to GACC Decree 248: it can be shared by the EU SME Centre upon request, please contact us.

Registration of so-called high-risk products

Q: Who is the 'competent authority' in my country that I should approach for completing the GACC registration? How does the registration process work?

A: The competent authority varies depending on the country, but in general are the food safety or health authorities. A full list of competent authorities in the EU Member States is provided as an Annex of these guidelines. The requirements and procedures for completing registrations of products within the 18 high-risk categories might vary.

For some categories of products, e.g. dairy, meat, producers may have already been registered before GACC 248 and 249, and if so do not need to register again. Relevant establishments can check if they appear in the CIFER system's register of enterprises – if so, they don't need to register again.

Q: Our establishment has already been reviewed by our competent authority in our home country, and obtained a username and password to login into the CIFER system. However, after filling in the details, the application cannot be submitted as GACC has not yet officially approved our competent authority for our product category. What should be done?

A: This issue was encountered specifically for honey products and the relevant competent authority in one EU Member State.

At that time, the relevant competent authority had not yet received the official approval from GACC to act as such for establishments producing honey products in that country. The only option available to individual establishments is to wait until the issue is solved at the government level.

Q: We have submitted all the necessary registration documents to our competent authority, but after three months we still have not received a GACC registration code. We contacted again our competent authority and they have not received feedback from GACC; we went to check on the CIFER system's register of enterprises but our establishment is not there. What should be done?

A: This is an issue that occurred to some establishments at the end of 2021 – before the official entry into force of GACC Decree 248. At that time, applications for the registration of establishments of high-risk products were collected and submitted in batch by the competent authority to GACC.

In this specific case, the application of the company was lost during the process and not transmitted by the competent authority to GACC. The establishment had to contact the competent authority again and resubmit its application.

Raw materials and suppliers

Q: Our company does not have a regular supplier of raw materials, we change them constantly. How do I fill in the relevant information in the system?

A: Without the red asterisk, it is optional to fill in the information under this section ('raw material information' and 'production correspondence').

If filling such information, it is recommended to include all your known suppliers of raw materials, i.e., those that you will potentially use in the future, regardless of whether you are using them at the moment or not. It doesn't matter if in the end you will not use any of the suppliers listed in the registration.

Q: Our company purchases raw materials from a broker, not from the direct producer. How do I fill in the relevant information in the system?

A: Without the red asterisk, it is optional to fill in the information under this section ('raw material information' and 'production correspondence').

If possible, it is recommended to obtain the relevant information on the raw material producer from your broker. If not possible, then you can fill the relevant information on your broker.

In fact, as a rule of thumb, you should fill in the information on the supplier with whom you have the most direct relationship.

Q: Our company is a trading company that only exports finished F&B products to China. The finished products are produced by several other suppliers worldwide. Do all the suppliers need to complete GACC registration? Which GACC registration code should be displayed on the finished product's package?

A: In general, it is recommended to use only one GACC registration code on one single product in order to avoid confusion and potential questions from Chinese customs authorities. It is recommended to use the GACC

registration code of the establishment that completes the finished product, and/or has the highest contribution to the product's processing process. The code should be clearly visible on the labelling as well as on the outer package.

During the GACC registration process, the establishment that completes the finished product may eventually indicate other establishments as their suppliers of raw materials / contributors to the processing. But if the field is not marked as mandatory (red asterisk) we recommend not to fill such information.

At the same time, it is suggested that all other companies involved in the processing complete their own GACC registration and obtain their own registration number. This will help in case at any stage the Chinese customs will require more information on the other actors involved.

Product produced in different countries/establishments

Q: My product is partially made in one country at one location, finished in another country in another location, which enterprise should I register in the manufacturer's registry database?

A: The rule of thumb is:

- *The company that completes the finished product will need to register with GACC, specifying during the registration (section 'Production correspondence') the information on all the other relevant companies in the production process (suppliers, transformation, etc)*
- *The country where the production process is completed will be regarded as the 'country of origin', therefore the manufacturer in that country will need to be registered in the single window system*

Q: Company A buys raw materials and packaging materials, then it outsources the entire production of the product to another establishment (belonging to another company B) in the same country. On the product packaging, it is specified that the product is packaged at the address of company B, which of course is different than that of company A; but company A still owns the brand and trademark of the finished product. Should company A or company B register with GACC?

Our understanding is that the production company B will be the one to register with GACC (specifying in the relevant section ('Production correspondence') the information about company A.

However, company A will still need to register with GACC as an exporter company (not a production company), which is not the Single Window but a different system (see FAQ under 'F&B producers vs exporters').

Q: Our company operates two different establishments – for both of which the GACC registration was completed. However, we received the same GACC registration code for two different establishments: is this normal?

A: The fundamental purpose of GACC Decree 248 is to ensure food safety, and to increase the traceability and management at the source of all F&B products imported into China. Therefore, each establishment registered with GACC must be allocated its own, unique code.

In case one same code was received by two different establishments, this is certainly a system bug/error which must be addressed to GACC operators.

F&B producers vs exporters

Q: Should I register with GACC if my company only exports the F&B product, but I am not the manufacturer of the product?

A: The GACC regulation starting on 1 January 2022 and the single window registration system (https://cifrt.singlewindow.cn) are set up specifically for registration of foreign F&B manufacturers whose products will be exported to China.

If one company is only responsible for export of goods, and does not manufacture or process the goods, then it should only submit a filing as 'overseas exporting company' on a separate system, accessible through GACC's Internet+Customs platform (http://online.customs.gov.cn), selecting the section 'Enterprise Management and Audit' → 'Filing of Importer and Exporter of Imported Food and Cosmetics' → 'Exporter/Agent filing of Imported Food and Cosmetics'.

Q: Our trading company was already registered as an overseas exporting company before the entry into force of GACC Degree 248. Should we register again?

A: The filing requirement for overseas F&B exporting companies had been in place already before GACC Decree 248 came into force on 1 January 2022, through another platform (http://ire.customs.gov.cn/#), therefore exporters and agents that had already filed their information do not need to do it again.

If in doubt, exporters and agents may verify that they are effectively included in the ad hoc database of GACC available on the same platform.

F&B storage enterprises

Q: Our establishment is responsible for the storage of F&B products, and not for the production of F&B products. Should we still register through the CIFER system?

A: Yes, GACC Decree 248 applies to enterprises producing, processing and storing F&B products that are exported to China. The registration procedure is roughly the same as that for production establishments (the box 'storage' should be ticked instead of 'production'), but more details will be asked on the specific premises of the storage facility.

Q: How is the term 'storage enterprise' defined? We have a warehouse where we store finished products waiting to be shipped to China, do we have to register this facility on the CIFER system?

A: The fundamental purpose of GACC Decree 248 is to ensure the safety of all F&B products imported to China. Therefore, 'storage' should be understood as applicable only to those products which require specific conditions to maintain their quality and safety, such as refrigeration, humidity, etc. Normal warehouses storing finished products therefore do not need to register on the CIFER system if no particular storing conditions are required.

Q: Our product is produced by our establishment, but it is stored by another establishment – both of which have already obtained a GACC registration code. Which of the two establishments' codes should be affixed to the product's packaging? Or maybe both codes should be affixed?

A: To date, such cases are still limited and there are no clear instructions from GACC on how to proceed.

Our recommendation, at this stage, is to use only one GACC registration code on the product's packaging, otherwise, two codes might be misleading for the consumers and might raise questions from Chinese customs – resulting in customs clearance delays. Specifically, it is recommended to use the code of the production establishment. However, it is fundamental that the storage company has also successfully received the registration code so that it could be communicated to Chinese customs in case needed for customs clearance.

Fill/edit the registration

Q: In the EU, business identity documents are often in the local languages and not issued in English. Is it still ok?

A: Business identity documents must be submitted in Chinese or English. If not possible to have business identity documents issued directly in these languages, you must have notarised translations into English or Chinese.

However, if there is an agreement between China and your country for Food Entry, Inspection and Quarantine, which stipulates that documentation can be submitted in other languages, then it is possible for you to submit business identity docs in those languages.

Q: Our GACC registration was approved, how can I add new products now?

A: You can add more products to the same registration (if belonging to the same low-risk product category, e.g. different flavours of juices or ice cream), only if:

- *The application has not been officially submitted (only 'saved')*
- *The application has already been accepted and the GACC code received. In this case, you should click on the 'Application for modification' on the left menu bar*

We have heard numerous cases of companies unable to add new products due to IT bugs. Recommended to list all products at the very beginning

Q: We want to add new products to a registration which has already received the GACC registration code. What attachments should be submitted in the 'Supporting materials to modify information' section?

A: Currently, there is no standard template to be attached, therefore the establishment can submit any document which is relevant to explain the product to be added, for instance describing the characteristics of the product, image of the product, etc. The system only allows to upload one file, so all relevant supporting documents must be merged into a single file first; creating a legend on the first page of all the documents will help GACC operators to approve the new additions.

Q: Our application was successfully approved by GACC, but we realised that the basic information of our establishment is wrong, specifically we inserted the name of the city where we are based as the enterprise name. Can it be changed?

A: As indicated in section 2, step 7, the CIFER system allows the establishment to change basic information after the registration code has been received. This can be done by clicking on 'Application for modification' on the left menu.

The name of the establishment can be modified – but there are other information which cannot, such as:

- *Registration number approved by the located competent authority*
- *Legal representative of the company*
- *Production site is relocated to a new address.*

If any of the above information needs to be changed, then a new registration must be submitted from scratch on the CIFER system.

Automatic changes in already approved registrations

Q: Our establishment has already successfully registered several products and obtained a GACC registration code. However, after a while, some of the products successfully registered do not appear anymore in our account – while in the past they did. What is this about?

A: This issue started to appear around March/April 2022. After the first months of implementation of the new regulation, GACC made a cleaning of all registrations completed by that time, resulting in the merging of some registrations/products with others which were considered duplicate or very similar. This, however, does not affect products that had successfully gotten the code.

Q: A new section 'Account Certification' appeared in our account, with certain information already pre-filled automatically by the system. However, some information are wrong, for instance in the 'enterprise name' field the name of the city appears. How to deal with this?

A: This is a section that was added to the system only recently. However, only establishments involved in the production, processing or storage of one of the 18 categories of high-risk products should fill it; low-risk categories can ignore this section.

All the information contained in this section, as well as the information not yet filled (such as 'reasons'), are under the responsibility of the establishment's competent authority in its home country, therefore the establishment should contact them.

Annex: List of food safety competent authorities in EU Member States

As seen in these guidelines, establishments responsible for the production, processing or storage of F&B products falling within the 18 high-risk categories, cannot complete GACC registration through the CIFER system independently; they need to do so in coordination with the competent authority responsible for food safety in the country/region where they are based.

In the EU, food safety is under the competence of Member States, therefore the competent authorities differ for each Member State. Sometimes, different competent authorities exist in one Member State for different product categories, e.g., if the product is of animal origin, plant origin, or if it is a food for special dietary purpose, etc. In order to facilitate European F&B producers in the process, and based on numerous requests received, the EU SME Centre has collected relevant **information and contact details of the competent authorities in the EU Member States**, which are summarised in the table below.

The information was collected through direct feedback from EU Member States representations in China. For some competent authorities, the **email contacts of the officers directly in charge are available** to the EU SME Centre but were not included in this section for personal information protection purposes; yet, they can be shared, upon request, with individual SMEs from the respective EU Member State.

Country	Competent authority	Contacts and notes
Austria	*Federal Ministry of Social Affairs, Health, Care and Consumer Protetction / Bundesministerium für Soziales, Gesundheit, Pflege und Konsumentenschutz (BMSGP)*	peking@advantageaustria.org +86 10 85 27 50 50
Belgium	*Federal Agency for the Safety of the Food Chain (FASFC)*	Reference code in CIFER: BELFASFC0 registration_cn@favv-afsca.be
Bulgaria	*Bulgarian Food Safety Agency*	export@bfsa.bg; fc@bfsa.bg
Croatia	▪ *Products of animal origin: Ministry of Agriculture, Veterinary and Food Safety Directorate General* ▪ *All other products: State Inspectorate of the Republic of Croatia, Sanitary Inspection Sector*	Email contacts of the officers directly in charge are available, please contact the EU SME Centre!
Cyprus	▪ *Veterinary Services of Cyprus* ▪ *Public Health Services of the Ministry of Health of Cyprus*	▪ director@vs.moa.gov.cy ▪ healthservices@mphs.moh.gov.cy Email contacts of the officers directly in charge are available, please contact the EU SME Centre!
Czechia	▪ *Czech Agriculture and Food Inspection Authority* ▪ *State Veterinary Administration of the Czech Republic*	▪ info@szpi.gov.cz Email contacts of the officers directly in charge are available, please contact the EU SME Centre!

Country	Competent authority	Contacts and notes
Denmark	*Danish Veterinary and Food Administration*	+45 72 27 69 00 Or contact through dedicated website form
Estonia	*Agriculture and Food Board / AFB*	+372 5304 5570; +372 5663 9346. Email contacts of the officers directly in charge are available, please contact the EU SME Centre!
Finland	*Finnish Food Authority*	kiina@ruokavirasto.fi More information on the official website.
France	▪ *Ministry of Agriculture, Directorate general for food (DGAL)* *(i) Meat and meat products;* *(ii) Casings;* *(iii) Seafood and aquatic products – except plant-based foodstuff (DGCCRF)* *(iv) Dairy products;* *(v) Honey and bee products;* *(vi) Eggs and derived products* ▪ *Ministry of Economics, Directorate general for competition policy, consumer affairs and fraud control (DGCCRF)* *(i) Edible fats and oils – except animal products (DGAL)* *(ii) Stuffed pasta – except animal products (DGAL)* *(iii) Edible grains – except products with phytosanitary agreement (DGAL)* *(iv) Grain milling industrial products and malt* *(v) Fresh and dehydrated vegetables, dried beans – except products with phytosanitary agreement (DGAL)* *(vi) Seasonings* *(vii) Nuts and seeds, dry fruits – except products with phytosanitary agreement (DGAL)* *(viii) Unroasted coffee beans and cocoa beans – except products with phytosanitary agreement (DGAL)* *(ix) Food for special dietary uses – except animal products (DGAL)* *(x) Health food – except animal products (DGAL)*	▪ DGAL: export.dgal@agriculture.gouv.fr ▪ DGCCRF: Bureau-4B@dgccrf.finances.gouv.fr

Country	Competent authority	Contacts and notes
Germany	*Federal Office of Consumer Protection and Food Safety / Bundesamt für Verbraucherschutz und Lebensmittelsicherheit (BVL)*	More information on BLV's website. German establishments should contact BVL only through their respected Federal Offices of Food Safety issues (for each of the 16 Bundesländer).
Greece	▪ *Foods of animal origin: Directorate of Public Health Veterinary Services / Ministry of Rural Development & Food* ▪ *Foods of plant origin: General Directorate of Foodstuffs / Ministry of Rural Development & Food* ▪ *Special dietary foods (excl. milk-based infant formula): National Organization for Medicines* ▪ *Functional foods: Hellenic Food Authority*	▪ +30 210 212 5748 ▪ +30 210 2124165 ▪ +30 213 2040000 ▪ +30 213 2145800 Email contacts of the officers directly in charge are available, please contact the EU SME Centre!
Hungary	*National Food Chain Safety Office (NÉBIH)*	▪ Products of animal origin: 0036 706451552 ▪ Other products: 0036 704360550 Email contacts of the officers directly in charge are available, please contact the EU SME Centre!
Ireland	▪ *Department of Agriculture, Food and the Marine* ▪ *Sea Fisheries Protection Agency*	Email contacts of the officers directly in charge are available, please contact the EU SME Centre!
Italy	*Italian Ministry of Health (MoH) – General Directorate of Hygiene, Food Safety and Nutrition – DGISAN Office 2 – Food Hygiene and Export*	Italian F&B producers should submit their requests/enquiries to the Food Hygiene and Nutrition Service (SIAN) of the Local Health Unit (ASL) responsible for the geographical location of the company. More info on MOH's website.
Latvia	*Food and Veterinary Service of the Republic of Latvia*	▪ pasts@pvd.gov.lv ▪ +371 67095230 More information on the official website.
Lithuania	*State Food and Veterinary Service*	info@vmvt.lt

Country	Competent authority	Contacts and notes
Netherlands	*Netherlands Food Safety Authority (NVWA)*	export@nvwa.nl
Poland	▪ *Products of animal origin* *General Veterinary Inspectorate* ▪ *All other products* *State Sanitary Inspection*	▪ wet@wetgiw.gov.pl ▪ Polish producers may contact the Embassy of Poland in China (email contacts available, please contact the EU SME Centre)
Portugal	*Directorate General for Food and Veterinary (DGAV), Ministry of Agriculture / Direção-Geral de Alimentação e Veterinária*	▪ 213 239 588 Contact form availabe on DGAV's website.
Romania	*National Sanitary Veterinary and Food Safety Authority / Autoritatea Nationala Sanitara Veterinara si pentru Siguranta Alimentelor (ANSVSA)*	office@ansvsa.ro More information and contact details available on ANSVSA's website.
Slovakia	▪ *State Veterinary and Food Administration of the Slovak Republic – Export, Import, International Relations Department* ▪ *Public Health Authority of the Slovak Republic*	▪ +421 2 60 257 122 ▪ +421 2 44455643 Email contacts of the officers directly in charge are available, please contact the EU SME Centre!
Slovenia	▪ *Animals and food of animal origin; plants and food of plant origin:* *Administration of the Republic of Slovenia for Food Safety, Veterinary Sector and Plant Protection* ▪ *Food supplements, food for special groups:* *Health Inspectorate of the Republic of Slovenia*	▪ +386 (0)1 300 13 31 ▪ +386 (0)1 280 38 02; gp.zirs@gov.si Email contacts of the officers directly in charge are available, please contact the EU SME Centre!
Spain	▪ *Ministry of Agriculture, Fisheries and Food (Animal Export Area of the General Deputy-directorate general for Sanitary Agreements and Border Control)* ▪ *Ministry of Health, through the Deputy-directorate general for Foreign Health*	▪ +34 913478241; exportacionanimal@mapa.es ▪ +34 915962040; exportacionsanidad@sanidad.gob.es Alternatively, Spanish producers may contact the Office of Agriculture, Fisheries and Food at the Embassy of Spain in China: pekin@mapa.es
Sweden	*The Swedish Food Agency*	exportfragor@slv.se

About the EU SME Centre

The EU SME Centre helps European SMEs get ready for China by providing them with a range of information, advice, training and support services.

To find out more, visit: www.eusmecentre.org.cn.

Do you have a question about doing business in China?

Ask one of our in-house experts and receive practical and confidential advice within seven working days. We can provide information and advice relating to business development, market access, legal issues, and human resources.

To submit your enquiries directly to our experts go to **Ask-the-Expert**: www.eusmecentre.org.cn/expert, or contact us at info@eusmecentre.org.cn

Further reading…

The EU SME Centre has nearly 200 reports, guidelines and case studies in its Knowledge Centre, the following may be relevant to you:

- *Exporting pork products to China (2022): https://www.eusmecentre.org.cn/report/exporting-pork-products-china*
- *The e-commerce ecosystem in China: a checklist for European SMEs (2021): https://www.eusmecentre.org.cn/report/e-commerce-ecosystem-china-checklist-european-smes-2021-update*
- *Guidelines on cross-border e-commerce (2019): https://www.eusmecentre.org.cn/guideline/guideline-cross-border-e-commerce-china-2019.*

We have also available **recordings of previous webinars** in this field:

- *Update on customs and logistics requirement for imported F&B products (Mar 2022): https://www.youtube.com/watch?v=9PJKe1ceDNI*
- *Communicating the value of EU GI F&B products to Chinese consumers (Jan 2022): https://www.youtube.com/watch?v=I7qQdbrSE_U*
- *China food & drink forum 2022 (Jan 2022): https://www.youtube.com/watch?v=teJFibfemDs*
- *Mandatory GACC registration for F&B producers (Dec 2021): https://www.youtube.com/watch?v=RighSyf4RAc*
- *How well are you prepared to sell online in China? (Apr 2021): https://www.youtube.com/watch?v=lfIJOIRxi0Q*
- *CBEC – Entering the Chinese market through the power of social networks (Dec 2020): https://www.youtube.com/watch?v=IYO28By_8eI*

We also have a dedicated **database of FAQs on the F&B sector**: https://www.eusmecentre.org.cn/faq

Co-funded by the COSME programme of the European Union

EU SME Centre
3-2-21 Sanlitun DRC
No. 1 Gongti North Road
Chaoyang District, Beijing, 100600
People's Republic of China

Phone: +86 10 8523 6098
Email: info@eusmecentre.org.cn
Website: www.eusmecentre.org.cn