



Πειραιάς

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ΠΕΡΙΦΕΡΕΙΑ ΑΤΤΙΚΗΣ  
ΔΙΕΥΘΥΝΣΗ ΑΓΡΟΤΙΚΗΣ ΟΙΚΟΝΟΜΙΑΣ &  
ΚΤΗΝΙΑΤΡΙΚΗΣ Π.Ε. ΠΕΙΡΑΙΑ**

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**ΠΡΟΣ: ΠΙΝΑΚΑ ΑΠΟΔΕΚΤΩΝ**

**ΘΕΜΑ:** «Ενημέρωση σχετικά με Ερωτήσεις και Απαντήσεις GACC σε νέα ερωτήματα Αντιπροσωπείας ΕΕ, σχετική με την εφαρμογή των Διαταγμάτων 248 & 249».

**Σχετ.:** Έγγραφό με Α.Π.: Φ. 2530/ΑΣ 978/07.07.2022 του Γραφείο Οικονομικών και Εμπορικών Υποθέσεων της Πρεσβείας της Ελλάδος στο Πεκίνο.

Σε συνέχεια του ανωτέρω σχετικού, αποστέλλουμε συνημμένα, προς ενημέρωση και κατά την κρίση σας αξιοποίηση, μετάφραση στην αγγλική των ερωτήσεων και απαντήσεων της Γενικής Διοίκησης Τελωνείων της Λαϊκής Δημοκρατίας της Κίνας, σε νέα γραπτά ερωτήματα της εδώ Αντιπροσωπείας της Ευρωπαϊκής Ένωσης, σχετικά με την εφαρμογή των Διαταγμάτων 248 & 249, ως περιήλθε από την Αντιπροσωπεία της ΕΕ στην Πρεσβεία της Ελλάδος στο Πεκίνο (Γραφείο Οικονομικών και Εμπορικών Υποθέσεων), μέσω του Υπουργείου Αγροτικής Ανάπτυξης & Τροφίμων (Διεύθυνση Ποιότητας και Ασφάλειας Τροφίμων - Τμήμα Ποιοτικού Ελέγχου και Ασφάλειας Τροφίμων Φυτικής Προέλευσης).

Συνημμένα:

1. **EU exports to China** –  
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## EU exports to China – Questions by the EU to be answered by China on “Decrees 248 and 249”

Topics <i>One per question</i>	Question	Answer
REGISTRATION PROCESS	<p>Prior to entry into force of Decree 248, GACC stated clearly in a verbal note (point 1B of verbal note n. 353 dated 27/09/2021) that establishments (for exports of four categories of meat, aquatic, dairy and bird’s nest products) waiting for GACC registration under former rules would benefit from the same registration procedure as of those having a trade history with China, provided they were recommended again by competent Authorities to GACC before 31 December 2021. Competent Authorities and operators have put a significant work load to submit by 31 December 2021 all documents requested by GACC under the former registration process</p> <p>However registration is still missing for various companies for which recommendations were notified before 31 December 2021 have not yet been registered. It is also worth pointing that GACC has refused to process some Member State’s applications for new fishery companies and meat companies submitted by the respective competent authority to GACC before the 31.12.2021.</p> <p>For some companies it was even indicated that now that Decree 248 has come into force, any establishment not yet registered in China should start the process from scratch and follow the new process under Decree 248. Such a request to start the registration process all over again would bring unjustified burden and further delays.</p> <p>Could GACC confirm that the registration process that was announced in the GACC letter of end September 2021 will apply to the companies that were recommended by competent Authorities to GACC before 31 December 2021? In other words that the whole process of registration does not need to be initiated again from scratch for</p>	<p>Applications from manufacturers of meat and aquatic, dairy and bird’s nest products recommended by EU member states that were submitted prior to December 31, 2021 remain valid. The Chinese side is currently organizing experts to evaluate these applications.</p> <p>The purpose of requiring the above mentioned applicants to upload the required information online to the CIFER system as well is to facilitate the subsequent work including ‘change of registration information’ and ‘extension of registration’ in future. China recommends that meat and aquatic product companies that apply before December 31, 2021 simultaneously submit relevant materials in the CIFER system as required.</p> <p>GACC promises that the filing date of this type of applications shall be subject to the initial date of the recommendation letter received from the foreign authority. Filling in the same application information onto the CIFER system won’t cause any delays in processing applications.</p>

**EU exports to China – Questions by the EU to be answered by China on “Decrees 248 and 249”**

<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
	establishments that were recommended by competent Authorities to GACC before 31 December 2021?	
Registration Process	<p>For companies notified to GACC before 31.12.2021, if documents would need to be uploaded now in CIFER it would not be evident if the registration process started after 01.01.2022 or earlier (which was the case): when uploading in CIFER the “new” documents (version of approximately November 2021) for these establishments they would appear further down in the line than those starting their registration later (e.g. in 01/2022).</p> <p>In addition, GACC has not provided passwords for several companies; especially those added to CIFER by GACC after 1.1.2022. Neither do these companies appear when logged into the competent authority’s user account (account management).</p> <p>Could China clarify what is the registration process to follow for applications for new fishery companies and meat companies recommended to GACC by the respective competent authority before the 31.12.2021 deadline?                      Could GACC inform how can the companies access accounts without a password, and how can the Member States manage these accounts?</p>	<p>Applications from manufacturers of meat and aquatic, dairy and bird’s nest products recommended by the EU Member States submitted prior to December 31, 2021 remain valid. The Chinese side is currently organizing experts to evaluate these applications.</p> <p>The purpose of requiring applicants to upload the required information online as well to the CIFER system is to facilitate the subsequent work including ‘change of registration information’ and ‘extension of registration’ in future. China recommends that meat and aquatic product companies that apply before December 31, 2021 simultaneously submit relevant materials in the CIFER system as required.</p> <p>The Chinese side promises that the filing date of this type of application shall be subject to the initial date of the recommendation letter received from the foreign authority. Filling in the same application information onto the CIFER system won’t cause any delays in processing applications.</p> <p>Could the EU please provide the name list of these enterprises, as well as the respective categories of their products so that GACC find the reason and fix the problems?</p>
Registration Process	Could China explain if there is any difference in the application process concerning high risk product categories between the companies that: 1) already pre-	If an enterprise believes that it has registered a wrong category for its product, it shall apply for cancellation of

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Topics <i>One per question</i>	Question	Answer
	listed (and may now appear in incorrect categories); and 2) are now applying for the first time?	that registration, and find the accurate product category and the corresponding HS code for that product, and apply again. The application procedure will be the same as its initial application.
Registration Process	<p>Could China clarify the reasons for absence of registration for a number of companies applied via fast track?</p> <p>Companies have now been instructed to register them via the system (CIFER) instead, which, in comparison, requires a substantially larger amount of information and preparation.</p>	<p>Could the EU side please provide the name list of these enterprises, as well as the enterprise address, product category, corresponding HS code, and business registration number in the applicant’s own country/region? So that to help the Chinese side to verify and fix the problem asap.</p>
	<p>In previous meetings &amp; exchanges with GACC, as well as all guidance issued by GACC, it has been understood that the registration number was required at the time of customs clearance (and not before). Since crossings from Europe to China take several weeks, it is important to ensure that the registration number is only requested in time for customs clearance, to avoid delaying shipments unnecessarily</p> <p>Can GACC confirm that products only need to be registered in time for customs clearance (with the obligation to enter the registration number in the import declaration), and not before the departure of the products?</p>	<p>According to the GACC’s Announcement No. 103 in 2021: For food exported to China, of which the shipment was dispatched on/after January 1, 2022, its Chinese registration number should be declared at the time of customs clearance.</p> <p>If an enterprise encounters the relevant problems during customs clearance, it can provide the list of the specific problems to the GACC, and we will verify and resolve the problems according to specific situations.</p>
Registration Process	<p>Could China provide the exact instructions about what information and materials are to be submitted in CIFER by 30 June 2023, including the procedures with regard to plants that should submit an application for renewal of registration before the date of 30 June 2023?</p> <p>Does the date of 30 June 2023 indicated by GACC for supplementing information and materials in the CIFER system, also apply to those establishments whose registration ends before 30/06/2023?</p>	<p>Previously, to ensure the smooth operation of food import activities, GACC directly registered the majority of manufacturers of foods within the 18 categories, and their registration data were directly migrated to the new system. But it is possible that some of the above mentioned information is incomplete in the new system.</p> <p>For manufacturers whose information have been migrated by GACC but are incomplete, they can submit the rest of</p>

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Topics <i>One per question</i>	Question	Answer
	<p>If the information and materials necessary for the evaluation of these plants need to be completed in the system before submitting the application for extension of registration, an indication of the appropriate dates by the Chinese side would be appreciated.</p> <p>The principle of synchronization (including regular updating) of the data of plants authorized to export to China, made available by the Chinese side in 3 online sources, is still unclear:</p> <p>on the GACC website (<a href="http://jckspj.customs.gov.cn/spj/zwgk75/2706880/2811812/index.html">http://jckspj.customs.gov.cn/spj/zwgk75/2706880/2811812/index.html</a>),</p> <p>on the ciferquery website (<a href="https://ciferquery.singlewindow.cn/">https://ciferquery.singlewindow.cn/</a>)</p> <p>and in the CIFER Single Window system (<a href="https://cifer.singlewindow.cn/">https://cifer.singlewindow.cn/</a>).</p>	<p>the required information online to the CIFER system (be selecting ‘change of information’) before June 30, 2023.</p> <p>It should be noted that these manufacturers should first go through the above mentioned step and complete their information in the CIFER system, and then they can apply to renew their registration.</p> <p>For inquiry, please log onto the CIFER system (‘China Import Food Enterprises Registration’ Management System) to learn their current registration status.</p> <p>Website link: <a href="https://cifer.singlewindow.cn/">https://cifer.singlewindow.cn/</a></p> <p>Or access the CIFER system via the single window portal website of China International Trade: <a href="https://www.singlewindow.cn/">https://www.singlewindow.cn/</a></p>
Registration Process	<p>Could GACC clarify whether the "old" lists of establishments published on the GACC website are still valid, and if so, we would appreciate the information if the Chinese side intends to update them according to the information provided by the competent authorities of the EU Member States before the effective date of decree No. 248?</p>	<p>The updated list of registered enterprises will be available on the CIFER system. For inquiry, please log onto the CIFER system (‘China Import Food Enterprises Registration’ Management System) to learn an enterprise’s current registration status. Website link: <a href="https://cifer.singlewindow.cn/">https://cifer.singlewindow.cn/</a></p> <p>Or access the CIFER system via the single window portal website of China International Trade: <a href="https://www.singlewindow.cn/">https://www.singlewindow.cn/</a></p>
Registration Process	<p>The Chinese authorities indicated that they would create a list of cold stores that can export dairy products to the Chinese market, however, to date, no such list is available</p>	<p>As requested, the CIFER system has been updated recently, and ‘cold storage’ has been added as a new category into the classification of ‘dairy production enterprises’.</p>

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
	<p>on the GACC website. Some Member States have asked China to include cold stores on the list of dairy plants, including the list of these cold stores. To date, the GACC has not included data of the above-mentioned cold stores neither in the CIFER Single Window system (<a href="https://cifer.singlewindow.cn/">https://cifer.singlewindow.cn/</a>), nor on any list published by GACC.</p> <p>Could GACC indicate when it intends to introduce the above-mentioned cold stores for dairy products into the system?</p>	<p>The Chinese side has started to evaluate the applications of the cold storage enterprises of dairy products, and will announce the result on the CIFER system once granting the registration according to regulations.</p>
<p>Registration process</p>	<p>In the production process of a dietary supplement four different companies intervene. Which of the following companies should be registered?</p> <p>Mix the ingredients in liquid state            Atomizes the product (from liquid state to powder            Aromatize the product            Packs the product in sachets</p>	<p>It is the overseas manufacturing enterprise exporting the final product to China that should register in the CIFER system.</p>
<p>Registration process</p>	<p>Could China explain if it is compulsory to provide CIQ codes of each product at the time of registration of the company?</p> <p>How could a company in the EU know the CIQ code that corresponds to each product to be exported?</p>	<p>Currently, when applying for registration, an enterprise needs to provide the 10-digit HS code and the 3-digit CIQ code.</p> <p>This is to avoid the circumstance that the customs clearance system is unable to accurately identify the sub-classification of products if using the 6-bit code or 8-bit code which cover a wider range of products, and thus effectively reducing the error of intercepts automatically generated by the customs clearance system.</p> <p>Please log onto the CIFER system to inquire the 10-digit HS code and CIQ code corresponding to each imported food product. the Web path(<a href="https://cifer.singlewindow.cn/">https://cifer.singlewindow.cn/</a>): Homepage Menu – Product Category query</p>

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
Registration process	<p>A company produces the ingredients and a third-party manufacturer encapsulates and packages the dietary supplement exported to China. Since the third-party manufacturer has carried out the last transformation, is the one that has registered under the new system. However, some customers are requesting the company that produces the ingredients to be registered as well.</p> <p>Is it necessary to register one or both companies and, if yes, which one?</p>	<p>It is the overseas manufacturing enterprise exporting the final product to China that should register in the CIFER system.</p>
Registration process	<p>Is it necessary to make a registration for each brand to be exported or is the registration number valid for the same tariff headings?</p>	<p>At present, the CIFER system allows the same enterprise to register multiple product brands under the same HS Code and CIQ code, but this is not mandatory.</p> <p>As long as an enterprise registers at least one of its product brands under a specific HS Code and CIQ code, it can go through the normal customs clearance process.</p>
Registration process	<p>A product (coffee extract, essences and concentrates) is manufactured in a Member States and to a European company that is the one that exports to China. Should the manufacturer (that does not export to) China register?</p>	<p>The CIFER system aims to administer the overseas manufacturers of imported foods, thus it is the manufacturing enterprise that should register.</p>
Registration process	<p>A company is going to transfer its commercial activity to a newly created company keeping the sanitary registration number. Should the new company be registered in the Chinese system, even if the health registration number is the same?</p>	<p>As specified in Article 19 of the GACC Decree No.248, ‘In cases of changing production site, legal representative, or registration number in the country/region where the manufacturer is located, the overseas manufacturer shall re-apply for registration, and the original Chinese registration number will automatically become invalid.’</p>
Registration process	<p>Could China confirm to which types of establishments is HACCP certification legally required?</p>	<p>The Chinese side does not require overseas food manufacturers to obtain third-party HACCP certification,</p>

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
		but meat and aquatic products and dairy production enterprises should establish an effective HACCP system.
Registration process	A company imports a product of tariff heading 2101.11.00 in bulk. It packages the product in its facilities and exports it to China with the same tariff heading. Does the primary producer that manufactures the bulk product need to be registered in China?	It is the overseas manufacturing enterprise exporting the final product to China that should register.
Registration Process	Some operators have had their registration rejected or received a “correction status”, with a possibility for the operator to re-submit the application after correcting the form, but in both cases, the source of the problem was not identified, making it hard to resolve.  Can GACC ensure that the source of an application rejection is clearly identified, to make it easier for companies to correct the problem as soon as possible?	For such cases, could the EU please provide the concrete examples together with clear screenshots? So that to help GACC to figure out the problem and find solutions.
Registration Process	Companies were initially asked to list all their products as part of their registration (or as part of any modifications of an existing registration). However, they have noticed that, following approval of their registration application, only one product per HS line remains – or, in other cases, no products are visible. Goods are still ‘en route’, so we do not know whether this will translate in possible blockages at the border at this stage.  Could GACC confirm that products will be able to clear customs even if their exact references are no longer listed in the list of products under the corresponding operator’s registration?	For such cases, could the EU please provide the concrete examples together with clear screenshots? So that to help GACC to figure out the problem and find solutions.
Registration Process	Companies still face difficulties with “complex” registrations. Could GACC advise these companies how to proceed with their registration?	It is the overseas manufacturing enterprise exporting the final product to China that should register.  GACC allows enterprises of country B to register. But the key problem is that country B is unable to issue ‘the

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
	<p>For instance, one company produces its beverage in EU country A, but bottles it in EU country B. GACC has not accepted the bottling site in country B as the correct entity that needs to register because it is based in a different country to the country of origin provided on the documentation (which was country A). The site in country A has submitted a registration application, however as they produce at an ABV higher than bottling strength, the HS code is different to the bottled product and what is on the shipping documents. This company is currently at an impasse as they cannot say that country B is their country of origin, but neither can they register the production site in country A with an incorrect ABV/HS code.</p> <p>How should this company proceed?</p>	<p>Certificate of Origin’ for such product according to the internationally accepted requirements for identifying the origin of alcoholic beverage products, which makes it impossible for such product to be imported to China. Thus it is recommended that the enterprises concerned to resolve such problem via commercial means such as entrusted processing</p>
<b>Registration Process</b>	<p>Some operators have reported that their registration request was submitted weeks ago, but they have not been able to check its status as their login details do not work anymore. How should they proceed? Changing their password/login details does not seem to be an option.</p>	<p>For such cases, could the EU please provide the concrete examples together with clear screenshots? So that to help GACC to figure out the problem and find solutions.</p>
<b>Registration Process</b>	<p>Article 19 of Order 248 requires that when changing legal representative in the country/region where the manufacturer is located, the overseas manufacturer must re-apply for registration with GACC, and the original Chinese registration number will automatically become invalid. This requirement poses significant challenges. Firstly, for multinational companies, the legal representative is normally the country CEOs or member of the legal board. However, those country CEOs or legal member could be regularly rotated between different regions within the group. Therefore, requiring a new number being registered every time that a legal</p>	<p>As specified in Article 19 of the GACC Decree No. 248, ‘In cases of changing legal representative in the country/region where the manufacturer is located, the overseas manufacturer shall re-apply for registration.’ This refers to the actual owner of the enterprise has changed.</p> <p>But in case the owner has not changed, but the person who actually manages the production site (establishment) has changed, the registered enterprise should first lodge an application for ‘change of information’, and GACC will evaluate the actual impact of such change on the enterprise's current food safety control and sanitation</p>

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
	<p>representative is changed seems disproportionate, considering that the rotation of the country CEOs does not have an impact on the food safety of the product, and could impose significant administrative burden on companies, especially when there is always a requirement to label the registration number on the inner &amp; outer packaging.</p> <p>Could GACC modify the registration system to allow companies to change the name of their legal representative through a simple amendment to an existing registration?</p> <p>Failing this, could GACC consider offering such a flexibility to “low risk” products subject to self-registration?</p>	<p>management system, and decide whether to approve such application.</p> <p>If GACC considers that such change may affect the food safety control and sanitation management system of this enterprise, GACC shall instead require this enterprise to lodge a new application for registration via the appropriate channel, as required by the relevant provisions. Once the new application is approved, the original registration number will automatically become invalid. If, after assessment, GACC considers such change or adjustment have no impact on the food safety control and sanitation management system of the enterprise, it shall process the application as a ‘change of information’.</p>
Registration Process	Could GACC make the request for supporting material to substantiate requests for changes to existing self-registrations optional?	<p>For manufacturers applying by themselves, when there is a change of information, they can lodge an application for ‘change of information’ to GACC, and provide (1) a comparison-table that exhibits the changed information and the original information; and (2) supporting materials related to the changed information.</p> <p>The comparison-table is used to explain what information has changed; and the supporting documents are used to prove the accuracy and necessity of the changed information.</p>
Registration Process	Could GACC list, once the Chinese registration number is obtained, in what customs documentation must the exporter include it?	<p>As specified in Article 15 of the GACC Decree No.248, ‘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.’</p> <p>For other documents attached with the products such as ‘the Certificate of Sanitary’, if such registration number</p>

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
		is required to be declared, it should be labelled in conformity with the requirements on such document.
Registration Process	Could China include in CIFER the dates and time of the updates made on the CIFER platform related, for example, with the updates of the checklists by the system and changes made by the operators?	GACC appreciate the suggestion from the EU. China will evaluate the necessity of your suggestion and determine whether to carry out a system optimization in the next steps.
Registration Process	Regarding checklists, the following information appears at the CIFER platform: "Please download the enterprise registration conditions and key points of comparison inspection, and sign as required, upload scanned copy." However, there is no field available for signature on the checklist, neither the clear information whether it should be signed by the competent authority. Could China include in CIFER an explanation on whether the checklist needs or not to be signed by the competent authority and, if yes, a field to allow the competent authority to sign it?	It has been clarified in the <Comparison Checklist> that 'it should be signed by an official and affixed with the official seal of the competent authority', which can be put in the blank space of the last page of the checklist.
Registration Process	Sometimes it is difficult to know who should upload certain type of information on the CIFER platform, i.e. the company/operator or the competent authority (e.g. checklists). Could China clarify this directly in CIFER (ideally) or in writing (outside CIFER)?	It is advised to refer to the relevant content in the User Operation Manual.
<b>CORRECTION OF REGISTRATION</b>		
Correction of Registration	Could GACC clarify whether the Chinese side intends to correct in the CIFER Single Window system incorrect names and/or addresses of establishments that have been transferred by GACC on the basis of outdated lists published on the GACC website (in some cases, the list of fish establishments posted on the Ciferquery website contains correct data, while the “old” list published on the	The "old" enterprise registration list previously announced on the website of the General Administration of Customs will be offline in the near future.  For enterprise registration information, please log on to the Internet sub-website of the Import and Export Food Safety Bureau of the General Administration of Customs (Internet address: <a href="http://jckspj.customs.gov.cn">http://jckspj.customs.gov.cn</a> )

## EU exports to China – Questions by the EU to be answered by China on “**Decrees 248 and 249**”

Topics <i>One per question</i>	Question	Answer
	GACC website and the plant data placed in the CIFER Single Window system contain errors)?	/)-Business Information-Registration Information of Overseas Manufacturers of Imported Food-Registration List of Overseas Manufacturers of Imported Food to inquire.
Correction of registration	<p>Some new products in the 14 categories are registered in incorrect categories, such as dried berries as cocoa beans and coffee beans.</p> <p>Because there was no product/HS-code list provided before the deadline, some manufacturers and products have been registered in incorrect categories with recommendation, when they should have proceeded to self-registration. On the other hand, some products that should have been registered with recommendation have only now come to light when China has provided the HS code list. Also, the names of some product categories have changed after the application process (for example stuffed pastry seems to be changed to stuffed pasta).</p> <p>Could GACC indicate when it will correct the mistakes in the registrations (without it affecting trade)? What should the competent authorities of Member States do to request GACC to correct the mistakes in the registrations?</p>	<p>It is suggested that the affected European enterprises register as soon as possible according to the actual product classification and the updated HS code, and at the same time lodge application to cancel the previous registration in China, which has been registered under the wrong HS code.</p> <p>If there is any impact on trade, for example an interruption in trade, it is suggested that the competent authority provide documentary evidence, the Chinese side will evaluate the situation and expedite the review process in order to ensure smooth trade.</p>
Correction of Registration	<p>There was a problem with the HS codes that the Chinese Customs incorporated into their computer system and assigned to some products that were already authorized by a registered company.</p> <p>It seems there were errors in the transfer of information from the old system to the new one, causing retention of merchandise, as certain tariff classification codes were not recognized.</p> <p>How and when will these problems be solved?</p>	It is suggested that the EU provide the list of the enterprises together with HS codes of the corresponding products as soon as possible, so that GACC could fix the problems.

## **EU exports to China – Questions by the EU to be answered by China on “Decrees 248 and 249”**

<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
Controls	<p>CIFER is accessible by authorized companies (e.g. companies authorised to export meat products) and the competent authorities of the Member States (in those registrations that require recommendation). However, CIFER does not allow the modification of the authorized products either by the companies themselves or by the authorities.</p> <p>Apparently, some Chinese custom inspectors were aware of these errors with the inadequate assignment of codes to companies that usually imported merchandise by their CIQ, and they allowed imports and reported this incident to their central services in order to be corrected. But, in other cases, Chinese custom inspectors have stopped those shipments.</p> <p>Could China indicate if it has already corrected these types of errors and, if not, when could it be corrected and prevented?</p>	<p>After launching the CIFER system, the Chinese side has migrated the data of the registered stock meat enterprises into the new system, and has optimized the CIFER system several times. At present, there is no such case where the approved meat products cannot be declared or are being stranded at the port. Could the EU please provide a detailed description of the situation and problem?</p>
<b>PRODUCT CATEGORIES</b>		
Product Categories	<p>Could China grant a period of grace or a specified time of entry into force of the updated list of HS codes (constantly changing without notice – potentially putting consignments at risk at customs)?</p>	<p>On March 24, 2022, the Food Safety Bureau has provided the updated commodity HS codes to the EU through the Letter of Food Bureau (2022) No.85.</p>
Product Categories	<p>Could GACC add the HS Code 3504 for <u>collagen peptides</u> to its Catalogue of HS codes? This would facilitate exports of collagen peptides, as the HS code 3504 – and not the HS code 2106 that exists in the Chinese catalogue and is required by some customs authorities in China (for <u>pure collagen peptides in bulk</u>) – is used in the EU and in countries outside the EU.</p>	<p>The protein products under item No. 3504 and No. 2106 administered by the Food Safety Bureau have been included in the registration system and can be declared normally.</p> <p>On the issue of product classification, please provide further detailed information of collagen peptide products, and the Food Safety Bureau will negotiate with the</p>

## **EU exports to China** – Questions by the EU to be answered by China on “**Decrees 248 and 249**”

<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
		relevant departments and make a judgment before replying.
Product categories	There are several categories to register under the same Chinese code, for example: powdered beverage, solid beverage, other beverage. How can they be distinguished in order to register?	At the time of registration, the corresponding CIQ code can be determined based on ‘processing technique’ and ‘product composition’.
<b>SCOPE</b>		
Scope	Could GACC publish an official note or guidance confirming that duty free products – particularly Hainan duty free – are not subject to Decree 248, in order to offer greater legal certainty to companies that this will remain the case over time?	At present, duty-free products and commercial samples that are determined not to enter the market for circulation or consumption do not need to be registered in China.  Please provide the Customs Declaration Number of the product, of which the local customs office requires registration number, and GACC will coordinate with the local customs for verification.
Scope	In December 2021, GACC indicated that commercial samples would be exempted from the obligations of Decree 248. Yet, in practice, local customs in China require a registration number for commercial samples.  Can GACC issue a public circular confirming that commercial samples do not fall under the scope of Decree 248?	
Scope	Does this decree apply to products sold through electronic commerce?	
Scope	Does this decree apply to products destined for export to a third country in transit through China?	
<b>LABELLING</b>		

**EU exports to China – Questions by the EU to be answered by China on “Decrees 248 and 249”**

Topics <i>One per question</i>	Question	Answer
Labelling	Can the Chinese registration number be indicated by adhesive stickers/labels?	<p>The GACC Decree No.248 does not stipulate the method of marking the registration number, individual enterprises can determine the applicable method for marking as appropriate, such as printing, sticking label, inkjet printing, etc., as long as it comply with the relevant provisions of &lt;the National Food Safety Standard General Rules for the Labeling of Prepackaged Foods GB7718&gt;.</p> <p>The Chinese labels of imported infant formula powder, health food and special dietary food must be printed on the minimum sales package and should not be the additional label affixed to the product.</p>
Labelling	Should the registration number be included on the bottles/cans and also in the box that contains them?	<p>As specified in 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.’</p> <p>The inner and outer packaging refers to the both transport packaging and the independent packaging of the sales unit that can be sold separately.</p>
Labelling	Can the registration number be added in China through labels that are put in bonded warehouses?	<p>The Chinese labels of imported infant milk powder, health food and special dietary food must be printed on the minimum sales package and should not be the additional label affixed to the product.</p> <p>The labeling requirements for imported meat and aquatic products should be in conformity with Article 30 of the GACC Decree No.249.</p>
IT SYSTEM		

## **EU exports to China – Questions by the EU to be answered by China on “Decrees 248 and 249”**

<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
IT system	<p>The GACC has published two user manuals for CIFER (in English) and, after the publication, the system itself has undergone several changes</p> <p>For example, could China clarify the requirements for the characters that can be used during registration (e.g.: minimum number, which characters cannot be used), and provide more detailed explanation of the mandatory rows (it is not always clear what data is expected exactly)?</p> <p>There is compulsory data and non-compulsory data. However, in many cases, the non-compulsory data must also be filled in, otherwise the system will not allow moving on. Could China clarify and simplify this?</p>	<p>In the CIFER system, the mandatory fields are marked using ‘*’. Applicants should fill in the registration fields according to the actual situation.</p> <p>If the European enterprises unable complete the registration for the reason of not filling in the non-required fields, please provide specific examples and clear screenshots to the Chinese side for reference, we will fix the problem asap.</p>
IT system	<p>The CIFER system is often unavailable (404 error message or access denial even if correct login details are used).</p> <p>Could China indicate which internet browser or browser setting work best with the system?</p> <p>The system does not provide the possibility to exchange messages between the GACC and the competent authority. For example: the authority does not know exactly what needs to be fixed if something is not correct according to the GACC. Could China put in place a faster information exchange, which would enable problems to be solved more quickly (not weeks)?</p>	<p>It is recommended that the EU use Chrome browser 50 or above to log onto the CIFER system.</p> <p>For mistakes pointed out by GACC, of which the competent authority concerned does not know how to correct, please provide specific examples and corresponding screenshots to facilitate the Chinese side to resolve the problem.</p>
IT system	<p>The CIFER system has been upgraded several times over the last months including after entry into force of Decree 248 on 01.01.2022. Could China publish one single and updated CIFER manual (in English) and organise a CIFER training (in English) for EU competent authorities and business organizations?</p>	<p>The latest User Operation Manual (English version) of the CIFER system will be released recently.</p> <p>If the EU intends to hold online training on the updated CIFER system, the Chinese side is willing to send experts to attend the training and answer relevant questions.</p>

## EU exports to China – Questions by the EU to be answered by China on “Decrees 248 and 249”

Topics <i>One per question</i>	Question	Answer
IT system	<p>Several companies have tried to contact the official GACC dedicated email address (<a href="mailto:eport@chinaport.gov.cn">eport@chinaport.gov.cn</a>) - which is the only email address available in the “Contact us” page of the CIFER platform) concerning technical issues with their registration. They received a standard reply with a CIFER manual and a recommendation to follow the guidance provided in the CIFER manual. This did not help them resolve their particular problem. We understand that reaching the hotline by phone is much more efficient, but communications by phone can only take place in Mandarin, which most SMEs do not master.</p> <p>Could GACC provide a hotline phone number in English?            Could GACC confirm that EU Member States and businesses should use the following e-mail address as Decree 248 contact point <a href="mailto:mxjciq@163.com">mxjciq@163.com</a> (or confirm what is the Decree 248 contact point email to be used)</p>	<p>China will continue to upgrade and optimize the CIFER system and User Operation Manual to ensure that most enterprises can use the system smoothly. For the few enterprises and individual problems, the Chinese side suggests that the enterprises concerned regularly or irregularly feedback the specific issues through the European Union or the competent authority of their own country/region via the current operating mode and working channel to the Chinese side, and GACC will respond positively as soon as possible.</p>
TRANSLATION		
Translations	<p><i>Note: request for translation of the following documents was sent to GACC on 5 May - GACC reply still pending</i></p> <p><b>Meat and meat products:</b></p> <p>Attachment 2_1_1 Application for registration of overseas production manufacturers of imported meat and meat products</p> <p>Attachment 4_1_2 Registration requirements for overseas production manufacturers of imported meat products and key points for comparison and inspection</p> <p>Attachment 7_1_1 Application for registration renewal of overseas manufacturers of imported meat and meat products</p>	<p>At present, the English version of the application forms referred in the question are available in the CIFER system, the applicants can apply for registration directly through the CIFER system.</p>

**EU exports to China** – Questions by the EU to be answered by China on “**Decrees 248 and 249**”

<p><b>Topics</b> <i>One per question</i></p>	<p><b>Question</b></p>	<p><b>Answer</b></p>
	<p><b>Dairy products:</b></p> <p>Attachment 2_3_1 Application form for registration of overseas officially recommended manufacturers of imported dairy products</p> <p>Attachment 2_3_2 Application form for registration of overseas officially recommended manufacturers of imported pasteurized milk</p> <p>Attachment 2_3_3 Application form for registration of overseas officially recommended manufacturers of imported formula milk products for infant and young children</p> <p>Attachment 4_3_3 Registration conditions of overseas manufacturers of imported dairy products (excluding pasteurized milk and formula milk products for infant and young children) and key points of comparison and inspection</p> <p>Attachment 7_3_1 Application for registration renewal of overseas officially recommended manufacturers for imported dairy products</p> <p>Attachment 7_3_2 Application for registration renewal of overseas officially recommended manufacturers for imported pasteurized milk</p> <p><b>Casings:</b></p> <p>Attachment 2_1_2 Application for registration of overseas manufacturers of imported casings</p> <p>Attachment 7_1_2 Application form for registration renewal of overseas manufacturers of imported casings</p> <p><b>Bee products:</b></p> <p>Attachment 2_1_4 Application for registration of an overseas manufacturer of imported bee products</p>	

**EU exports to China – Questions by the EU to be answered by China on “Decrees 248 and 249”**

<p><b>Topics</b> <i>One per question</i></p>	<p><b>Question</b></p>	<p><b>Answer</b></p>
	<p>Attachment 4_1_5 Registration requirements for overseas manufacturers of imported bee products and key points for comparison and inspection</p> <p>Attachment 7_1_4 Application for registration renewal of overseas manufacturers of imported bee products</p> <p><b>Special dietary foods:</b></p> <p>Attachment 2_3_5 Application form for registration of overseas officially recommended manufacturers of imported special dietary foods</p> <p>Attachment 4_3_5 Registration conditions of overseas manufacturers for imported special dietary foods and key points for comparison and inspection</p> <p>Attachment 7_3_5 Application for registration renewal of overseas officially recommended manufacturers for imported special dietary food</p> <p><b>Functional foods:</b></p> <p>Attachment 2_3_4 Application form for registration of overseas officially recommended manufacturers of imported functional foods</p> <p>Attachment 7_3_4 Application for registration renewal of overseas officially recommended manufacturers for imported functional foods</p> <p><b>Plant-derived food:</b></p> <p>Attachment 2_2 Application form for registration of an overseas officially recommended production manufacturers for imported plant-derived food</p> <p>Attachment 7_2 Application for registration renewal of overseas officially recommended manufacturers for imported plant-derived food</p>	

## EU exports to China – Questions by the EU to be answered by China on “Decrees 248 and 249”

Topics <i>One per question</i>	Question	Answer
	<p><b>Others:</b></p> <p>Attachment 11 Application for registration of self-applied overseas manufacturers of imported foods</p> <p>Attachment 13 Application for registration renewal self-applied overseas manufacturers of imported foods</p>	
Translations	<p>If available, could China share the translations in English of the following GBs standards (if available):</p> <p>For casings: GB/T 7740</p> <p>In category of the dietary products category:</p> <ul style="list-style-type: none"> <li>o GB 25596-2010 (infant formulas for special medical purposes)</li> <li>o GB 22570-2014 (food supplements)</li> <li>o GB 29922-2013 (food for special medical purposes)</li> <li>o GB 24154-2015 (sports nutrition)</li> <li>o GB 8950-2016 (canned foods)</li> <li>o GB 12695-2016 (hygienic production of beverages)</li> </ul> <p>In the category of functional food:</p> <ul style="list-style-type: none"> <li>o GB 17405-1998 (functional foods)</li> <li>o GB/T 27320 (food protection in food processing establishments)</li> <li>o T/CNFIA001-2017 (General Guide for Food Preservation Periods)</li> </ul>	GACC does not have the English translation of these national standards.
Translations	<p>Language problems are a constant problem when using the system in English. Many of the drop-down lists (e.g.: HS/CIQ) and the error messages are in Chinese, which often makes the system difficult to use.</p>	<p>At present, only a few webpage content of the CIFER system does not have its corresponding English version, including commodity names, CIQ names, etc. This is because there is no official English translation for these names.</p>

**EU exports to China – Questions by the EU to be answered by China on “Decrees 248 and 249”**

<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
	<p>There is a checklist (Registration Conditions and Control Inspection Points of Overseas Manufacturers of Imported Food) for each food category. These are required to be filled in and uploaded, but the system does not always provide them in English.</p> <p>We would like to ask that the check lists for all food categories in English are provided in advance. It would make the whole process easier if we were aware of the requirements in advance.</p> <p>We would like to get information about where the Chinese requirements (mainly standards) that are indicated in the checklists are available in English.</p>	
<p>Translations</p>	<p>Could China harmonize the checklists on the CIFER platform? For example, the two checklists for dairy products and the checklist for fish are written only in English; the checklist for beekeeping products appears in the Chinese/English version, with English version underlined and written in red, also in point 12.2, there is a part in the text without an English translation; the checklist for meat appears in the Chinese/English version and the checklist for meat products appears in the Chinese/English version, but points 8. and 9. are not translated.</p>	<p>As requested, GACC has updated the checklists for bee products, meat and meat products in the CIFER system.</p>

**EU exports to China – Questions by the EU to be answered by China on “Decrees 248 and 249”**

<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
<b>REGISTRATION PROCESS</b>	<p>Prior to entry into force of Decree 248, GACC stated clearly in a verbal note (point 1B of verbal note n. 353 dated 27/09/2021) that establishments (for exports of four categories of meat, aquatic, dairy and bird’s nest products) waiting for GACC registration under former rules would benefit from the same registration procedure as of those having a trade history with China, provided they were recommended again by competent Authorities to GACC before 31 December 2021. Competent Authorities and operators have put a significant work load to submit by 31 December 2021 all documents requested by GACC under the former registration process</p> <p>However registration is still missing for various companies for which recommendations were notified before 31 December 2021 have not yet been registered. It is also worth pointing that GACC has refused to process some Member State’s applications for new fishery companies and meat companies submitted by the respective competent authority to GACC before the 31.12.2021.</p> <p>For some companies it was even indicated that now that Decree 248 has come into force, any establishment not yet registered in China should start the process from scratch and follow the new process under Decree 248. Such a request to start the registration process all over again would bring unjustified burden and further delays.</p> <p>Could GACC confirm that the registration process that was announced in the GACC letter of end September 2021 will apply to the companies that were recommended by competent Authorities to GACC before 31 December 2021? In other words that the whole process of registration does not need to be initiated again from scratch for</p>	<p>Applications from manufacturers of meat and aquatic, dairy and bird’s nest products recommended by EU member states that were submitted prior to December 31, 2021 remain valid. The Chinese side is currently organizing experts to evaluate these applications.</p> <p>The purpose of requiring the above mentioned applicants to upload the required information online to the CIFER system as well is to facilitate the subsequent work including ‘change of registration information’ and ‘extension of registration’ in future. China recommends that meat and aquatic product companies that apply before December 31, 2021 simultaneously submit relevant materials in the CIFER system as required.</p> <p>GACC promises that the filing date of this type of applications shall be subject to the initial date of the recommendation letter received from the foreign authority. Filling in the same application information onto the CIFER system won’t cause any delays in processing applications.</p>

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
	establishments that were recommended by competent Authorities to GACC before 31 December 2021?	
Registration Process	<p>For companies notified to GACC before 31.12.2021, if documents would need to be uploaded now in CIFER it would not be evident if the registration process started after 01.01.2022 or earlier (which was the case): when uploading in CIFER the “new” documents (version of approximately November 2021) for these establishments they would appear further down in the line than those starting their registration later (e.g. in 01/2022).</p> <p>In addition, GACC has not provided passwords for several companies; especially those added to CIFER by GACC after 1.1.2022. Neither do these companies appear when logged into the competent authority’s user account (account management).</p> <p>Could China clarify what is the registration process to follow for applications for new fishery companies and meat companies recommended to GACC by the respective competent authority before the 31.12.2021 deadline?                      Could GACC inform how can the companies access accounts without a password, and how can the Member States manage these accounts?</p>	<p>Applications from manufacturers of meat and aquatic, dairy and bird’s nest products recommended by the EU Member States submitted prior to December 31, 2021 remain valid. The Chinese side is currently organizing experts to evaluate these applications.</p> <p>The purpose of requiring applicants to upload the required information online as well to the CIFER system is to facilitate the subsequent work including ‘change of registration information’ and ‘extension of registration’ in future. China recommends that meat and aquatic product companies that apply before December 31, 2021 simultaneously submit relevant materials in the CIFER system as required.</p> <p>The Chinese side promises that the filing date of this type of application shall be subject to the initial date of the recommendation letter received from the foreign authority. Filling in the same application information onto the CIFER system won’t cause any delays in processing applications.</p> <p>Could the EU please provide the name list of these enterprises, as well as the respective categories of their products so that GACC find the reason and fix the problems?</p>
Registration Process	Could China explain if there is any difference in the application process concerning high risk product categories between the companies that: 1) already pre-	If an enterprise believes that it has registered a wrong category for its product, it shall apply for cancellation of

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Topics <i>One per question</i>	Question	Answer
	<p>listed (and may now appear in incorrect categories); and 2) are now applying for the first time?</p>	<p>that registration, and find the accurate product category and the corresponding HS code for that product, and apply again. The application procedure will be the same as its initial application.</p>
<p>Registration Process</p>	<p>Could China clarify the reasons for absence of registration for a number of companies applied via fast track?</p> <p>Companies have now been instructed to register them via the system (CIFER) instead, which, in comparison, requires a substantially larger amount of information and preparation.</p>	<p>Could the EU side please provide the name list of these enterprises, as well as the enterprise address, product category, corresponding HS code, and business registration number in the applicant’s own country/region? So that to help the Chinese side to verify and fix the problem asap.</p>
	<p>In previous meetings &amp; exchanges with GACC, as well as all guidance issued by GACC, it has been understood that the registration number was required at the time of customs clearance (and not before). Since crossings from Europe to China take several weeks, it is important to ensure that the registration number is only requested in time for customs clearance, to avoid delaying shipments unnecessarily</p> <p>Can GACC confirm that products only need to be registered in time for customs clearance (with the obligation to enter the registration number in the import declaration), and not before the departure of the products?</p>	<p>According to the GACC’s Announcement No. 103 in 2021: For food exported to China, of which the shipment was dispatched on/after January 1, 2022, its Chinese registration number should be declared at the time of customs clearance.</p> <p>If an enterprise encounters the relevant problems during customs clearance, it can provide the list of the specific problems to the GACC, and we will verify and resolve the problems according to specific situations.</p>
<p>Registration Process</p>	<p>Could China provide the exact instructions about what information and materials are to be submitted in CIFER by 30 June 2023, including the procedures with regard to plants that should submit an application for renewal of registration before the date of 30 June 2023?</p> <p>Does the date of 30 June 2023 indicated by GACC for supplementing information and materials in the CIFER system, also apply to those establishments whose registration ends before 30/06/2023?</p>	<p>Previously, to ensure the smooth operation of food import activities, GACC directly registered the majority of manufacturers of foods within the 18 categories, and their registration data were directly migrated to the new system. But it is possible that some of the above mentioned information is incomplete in the new system.</p> <p>For manufacturers whose information have been migrated by GACC but are incomplete, they can submit the rest of</p>

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Topics <i>One per question</i>	Question	Answer
	<p>If the information and materials necessary for the evaluation of these plants need to be completed in the system before submitting the application for extension of registration, an indication of the appropriate dates by the Chinese side would be appreciated.</p> <p>The principle of synchronization (including regular updating) of the data of plants authorized to export to China, made available by the Chinese side in 3 online sources, is still unclear:</p> <p>on the GACC website (<a href="http://jckspj.customs.gov.cn/spj/zwgk75/2706880/2811812/index.html">http://jckspj.customs.gov.cn/spj/zwgk75/2706880/2811812/index.html</a>),</p> <p>on the ciferquery website (<a href="https://ciferquery.singlewindow.cn/">https://ciferquery.singlewindow.cn/</a>)</p> <p>and in the CIFER Single Window system (<a href="https://cifer.singlewindow.cn/">https://cifer.singlewindow.cn/</a>).</p>	<p>the required information online to the CIFER system (be selecting ‘change of information’) before June 30, 2023.</p> <p>It should be noted that these manufacturers should first go through the above mentioned step and complete their information in the CIFER system, and then they can apply to renew their registration.</p> <p>For inquiry, please log onto the CIFER system (‘China Import Food Enterprises Registration’ Management System) to learn their current registration status.</p> <p>Website link: <a href="https://cifer.singlewindow.cn/">https://cifer.singlewindow.cn/</a></p> <p>Or access the CIFER system via the single window portal website of China International Trade: <a href="https://www.singlewindow.cn/">https://www.singlewindow.cn/</a></p>
Registration Process	<p>Could GACC clarify whether the "old" lists of establishments published on the GACC website are still valid, and if so, we would appreciate the information if the Chinese side intends to update them according to the information provided by the competent authorities of the EU Member States before the effective date of decree No. 248?</p>	<p>The updated list of registered enterprises will be available on the CIFER system. For inquiry, please log onto the CIFER system (‘China Import Food Enterprises Registration’ Management System) to learn an enterprise’s current registration status. Website link: <a href="https://cifer.singlewindow.cn/">https://cifer.singlewindow.cn/</a></p> <p>Or access the CIFER system via the single window portal website of China International Trade: <a href="https://www.singlewindow.cn/">https://www.singlewindow.cn/</a></p>
Registration Process	<p>The Chinese authorities indicated that they would create a list of cold stores that can export dairy products to the Chinese market, however, to date, no such list is available on the GACC website. Some Member States have asked</p>	<p>As requested, the CIFER system has been updated recently, and ‘cold storage’ has been added as a new category into the classification of ‘dairy production enterprises’.</p>

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
	<p>China to include cold stores on the list of dairy plants, including the list of these cold stores. To date, the GACC has not included data of the above-mentioned cold stores neither in the CIFER Single Window system (<a href="https://cifer.singlewindow.cn/">https://cifer.singlewindow.cn/</a>), nor on any list published by GACC.</p> <p>Could GACC indicate when it intends to introduce the above-mentioned cold stores for dairy products into the system?</p>	<p>The Chinese side has started to evaluate the applications of the cold storage enterprises of dairy products, and will announce the result on the CIFER system once granting the registration according to regulations.</p>
<p>Registration process</p>	<p>In the production process of a dietary supplement four different companies intervene. Which of the following companies should be registered?</p> <p>Mix the ingredients in liquid state            Atomizes the product (from liquid state to powder)            Aromatize the product            Packs the product in sachets</p>	<p>It is the overseas manufacturing enterprise exporting the final product to China that should register in the CIFER system.</p>
<p>Registration process</p>	<p>Could China explain if it is compulsory to provide CIQ codes of each product at the time of registration of the company?</p> <p>How could a company in the EU know the CIQ code that corresponds to each product to be exported?</p>	<p>Currently, when applying for registration, an enterprise needs to provide the 10-digit HS code and the 3-digit CIQ code.</p> <p>This is to avoid the circumstance that the customs clearance system is unable to accurately identify the sub-classification of products if using the 6-bit code or 8-bit code which cover a wider range of products, and thus effectively reducing the error of intercepts automatically generated by the customs clearance system.</p> <p>Please log onto the CIFER system to inquire the 10-digit HS code and CIQ code corresponding to each imported food product. the Web path(<a href="https://cifer.singlewindow.cn/">https://cifer.singlewindow.cn/</a>): Homepage Menu – Product Category query</p>

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
Registration process	<p>A company produces the ingredients and a third-party manufacturer encapsulates and packages the dietary supplement exported to China. Since the third-party manufacturer has carried out the last transformation, is the one that has registered under the new system. However, some customers are requesting the company that produces the ingredients to be registered as well.</p> <p>Is it necessary to register one or both companies and, if yes, which one?</p>	<p>It is the overseas manufacturing enterprise exporting the final product to China that should register in the CIFER system.</p>
Registration process	<p>Is it necessary to make a registration for each brand to be exported or is the registration number valid for the same tariff headings?</p>	<p>At present, the CIFER system allows the same enterprise to register multiple product brands under the same HS Code and CIQ code, but this is not mandatory.</p> <p>As long as an enterprise registers at least one of its product brands under a specific HS Code and CIQ code, it can go through the normal customs clearance process.</p>
Registration process	<p>A product (coffee extract, essences and concentrates) is manufactured in a Member States and to a European company that is the one that exports to China. Should the manufacturer (that does not export to) China register?</p>	<p>The CIFER system aims to administer the overseas manufacturers of imported foods, thus it is the manufacturing enterprise that should register.</p>
Registration process	<p>A company is going to transfer its commercial activity to a newly created company keeping the sanitary registration number. Should the new company be registered in the Chinese system, even if the health registration number is the same?</p>	<p>As specified in Article 19 of the GACC Decree No.248, ‘In cases of changing production site, legal representative, or registration number in the country/region where the manufacturer is located, the overseas manufacturer shall re-apply for registration, and the original Chinese registration number will automatically become invalid.’</p>
Registration process	<p>Could China confirm to which types of establishments is HACCP certification legally required?</p>	<p>The Chinese side does not require overseas food manufacturers to obtain third-party HACCP certification, but meat and aquatic products and dairy production enterprises should establish an effective HACCP system.</p>

**EU exports to China – Questions by the EU to be answered by China on “Decrees 248 and 249”**

<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
Registration process	A company imports a product of tariff heading 2101.11.00 in bulk. It packages the product in its facilities and exports it to China with the same tariff heading. Does the primary producer that manufactures the bulk product need to be registered in China?	It is the overseas manufacturing enterprise exporting the final product to China that should register.
Registration Process	Some operators have had their registration rejected or received a “correction status”, with a possibility for the operator to re-submit the application after correcting the form, but in both cases, the source of the problem was not identified, making it hard to resolve.  Can GACC ensure that the source of an application rejection is clearly identified, to make it easier for companies to correct the problem as soon as possible?	For such cases, could the EU please provide the concrete examples together with clear screenshots? So that to help GACC to figure out the problem and find solutions.
Registration Process	Companies were initially asked to list all their products as part of their registration (or as part of any modifications of an existing registration). However, they have noticed that, following approval of their registration application, only one product per HS line remains – or, in other cases, no products are visible. Goods are still ‘en route’, so we do not know whether this will translate in possible blockages at the border at this stage.  Could GACC confirm that products will be able to clear customs even if their exact references are no longer listed in the list of products under the corresponding operator’s registration?	For such cases, could the EU please provide the concrete examples together with clear screenshots? So that to help GACC to figure out the problem and find solutions.
Registration Process	Companies still face difficulties with “complex” registrations. Could GACC advise these companies how to proceed with their registration?  For instance, one company produces its beverage in EU country A, but bottles it in EU country B. GACC has not accepted the bottling site in country B as the correct entity that needs to register because it is based in a different	It is the overseas manufacturing enterprise exporting the final product to China that should register.  GACC allows enterprises of country B to register. But the key problem is that country B is unable to issue ‘the Certificate of Origin’ for such product according to the internationally accepted requirements for identifying the origin of alcoholic beverage products, which makes it

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
	<p>country to the country of origin provided on the documentation (which was country A). The site in country A has submitted a registration application, however as they produce at an ABV higher than bottling strength, the HS code is different to the bottled product and what is on the shipping documents. This company is currently at an impasse as they cannot say that country B is their country of origin, but neither can they register the production site in country A with an incorrect ABV/HS code.</p> <p>How should this company proceed?</p>	<p>impossible for such product to be imported to China. Thus it is recommended that the enterprises concerned to resolve such problem via commercial means such as entrusted processing</p>
<p>Registration Process</p>	<p>Some operators have reported that their registration request was submitted weeks ago, but they have not been able to check its status as their login details do not work anymore. How should they proceed? Changing their password/login details does not seem to be an option.</p>	<p>For such cases, could the EU please provide the concrete examples together with clear screenshots? So that to help GACC to figure out the problem and find solutions.</p>
<p>Registration Process</p>	<p>Article 19 of Order 248 requires that when changing legal representative in the country/region where the manufacturer is located, the overseas manufacturer must re-apply for registration with GACC, and the original Chinese registration number will automatically become invalid. This requirement poses significant challenges. Firstly, for multinational companies, the legal representative is normally the country CEOs or member of the legal board. However, those country CEOs or legal member could be regularly rotated between different regions within the group. Therefore, requiring a new number being registered every time that a legal representative is changed seems disproportionate, considering that the rotation of the country CEOs does not have an impact on the food safety of the product, and could impose significant administrative burden on companies, especially when there is always a requirement</p>	<p>As specified in Article 19 of the GACC Decree No. 248, ‘In cases of changing legal representative in the country/region where the manufacturer is located, the overseas manufacturer shall re-apply for registration.’ This refers to the actual owner of the enterprise has changed.</p> <p>But in case the owner has not changed, but the person who actually manages the production site (establishment) has changed, the registered enterprise should first lodge an application for ‘change of information’, and GACC will evaluate the actual impact of such change on the enterprise’s current food safety control and sanitation management system, and decide whether to approve such application.</p> <p>If GACC considers that such change may affect the food safety control and sanitation management system of this enterprise, GACC shall instead require this enterprise to</p>

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
	<p>to label the registration number on the inner &amp; outer packaging.</p> <p>Could GACC modify the registration system to allow companies to change the name of their legal representative through a simple amendment to an existing registration?</p> <p>Failing this, could GACC consider offering such a flexibility to “low risk” products subject to self-registration?</p>	<p>lodge a new application for registration via the appropriate channel, as required by the relevant provisions. Once the new application is approved, the original registration number will automatically become invalid. If, after assessment, GACC considers such change or adjustment have no impact on the food safety control and sanitation management system of the enterprise, it shall process the application as a ‘change of information’.</p>
Registration Process	<p>Could GACC make the request for supporting material to substantiate requests for changes to existing self-registrations optional?</p>	<p>For manufacturers applying by themselves, when there is a change of information, they can lodge an application for ‘change of information’ to GACC, and provide (1) a comparison-table that exhibits the changed information and the original information; and (2) supporting materials related to the changed information.</p> <p>The comparison-table is used to explain what information has changed; and the supporting documents are used to prove the accuracy and necessity of the changed information.</p>
Registration Process	<p>Could GACC list, once the Chinese registration number is obtained, in what customs documentation must the exporter include it?</p>	<p>As specified in Article 15 of the GACC Decree No.248, ‘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.’</p> <p>For other documents attached with the products such as ‘the Certificate of Sanitary’, if such registration number is required to be declared, it should be labelled in conformity with the requirements on such document.</p>
Registration Process	<p>Could China include in CIFER the dates and time of the updates made on the CIFER platform related, for example, with the updates of the checklists by the system and changes made by the operators?</p>	<p>GACC appreciate the suggestion from the EU.</p>

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Topics <i>One per question</i>	Question	Answer
		China will evaluate the necessity of your suggestion and determine whether to carry out a system optimization in the next steps.
Registration Process	Regarding checklists, the following information appears at the CIFER platform: "Please download the enterprise registration conditions and key points of comparison inspection, and sign as required, upload scanned copy." However, there is no field available for signature on the checklist, neither the clear information whether it should be signed by the competent authority. Could China include in CIFER an explanation on whether the checklist needs or not to be signed by the competent authority and, if yes, a field to allow the competent authority to sign it?	It has been clarified in the <Comparison Checklist> that 'it should be signed by an official and affixed with the official seal of the competent authority', which can be put in the blank space of the last page of the checklist.
Registration Process	Sometimes it is difficult to know who should upload certain type of information on the CIFER platform, i.e. the company/operator or the competent authority (e.g. checklists). Could China clarify this directly in CIFER (ideally) or in writing (outside CIFER)?	It is advised to refer to the relevant content in the User Operation Manual.
CORRECTION OF REGISTRATION		
Correction of Registration	Could GACC clarify whether the Chinese side intends to correct in the CIFER Single Window system incorrect names and/or addresses of establishments that have been transferred by GACC on the basis of outdated lists published on the GACC website (in some cases, the list of fish establishments posted on the Ciferquery website contains correct data, while the “old” list published on the GACC website and the plant data placed in the CIFER Single Window system contain errors)?	The "old" enterprise registration list previously announced on the website of the General Administration of Customs will be offline in the near future.  For enterprise registration information, please log on to the Internet sub-website of the Import and Export Food Safety Bureau of the General Administration of Customs (Internet address: <a href="http://jckspj.customs.gov.cn">http://jckspj.customs.gov.cn</a> )  /)-Business Information-Registration Information of Overseas Manufacturers of Imported Food-Registration List of Overseas Manufacturers of Imported Food to inquire.

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
<p>Correction of registration</p>	<p>Some new products in the 14 categories are registered in incorrect categories, such as dried berries as cocoa beans and coffee beans.</p> <p>Because there was no product/HS-code list provided before the deadline, some manufacturers and products have been registered in incorrect categories with recommendation, when they should have proceeded to self-registration. On the other hand, some products that should have been registered with recommendation have only now come to light when China has provided the HS code list. Also, the names of some product categories have changed after the application process (for example stuffed pastry seems to be changed to stuffed pasta).</p> <p>Could GACC indicate when it will correct the mistakes in the registrations (without it affecting trade)? What should the competent authorities of Member States do to request GACC to correct the mistakes in the registrations?</p>	<p>It is suggested that the affected European enterprises register as soon as possible according to the actual product classification and the updated HS code, and at the same time lodge application to cancel the previous registration in China, which has been registered under the wrong HS code.</p> <p>If there is any impact on trade, for example an interruption in trade, it is suggested that the competent authority provide documentary evidence, the Chinese side will evaluate the situation and expedite the review process in order to ensure smooth trade.</p>
<p>Correction of Registration</p>	<p>There was a problem with the HS codes that the Chinese Customs incorporated into their computer system and assigned to some products that were already authorized by a registered company.</p> <p>It seems there were errors in the transfer of information from the old system to the new one, causing retention of merchandise, as certain tariff classification codes were not recognized.</p> <p>How and when will these problems be solved?</p>	<p>It is suggested that the EU provide the list of the enterprises together with HS codes of the corresponding products as soon as possible, so that GACC could fix the problems.</p>
<p>Controls</p>	<p>CIFER is accessible by authorized companies (e.g. companies authorised to export meat products) and the competent authorities of the Member States (in those registrations that require recommendation). However, CIFER does not allow the modification of the authorized</p>	<p>After launching the CIFER system, the Chinese side has migrated the data of the registered stock meat enterprises into the new system, and has optimized the CIFER system several times. At present, there is no such case where the approved meat products cannot be declared or</p>

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
	<p>products either by the companies themselves or by the authorities.</p> <p>Apparently, some Chinese custom inspectors were aware of these errors with the inadequate assignment of codes to companies that usually imported merchandise by their CIQ, and they allowed imports and reported this incident to their central services in order to be corrected. But, in other cases, Chinese custom inspectors have stopped those shipments.</p> <p>Could China indicate if it has already corrected these types of errors and, if not, when could it be corrected and prevented?</p>	<p>are being stranded at the port. Could the EU please provide a detailed description of the situation and problem?</p>
<b>PRODUCT CATEGORIES</b>		
Product Categories	<p>Could China grant a period of grace or a specified time of entry into force of the updated list of HS codes (constantly changing without notice – potentially putting consignments at risk at customs)?</p>	<p>On March 24, 2022, the Food Safety Bureau has provided the updated commodity HS codes to the EU through the Letter of Food Bureau (2022) No.85.</p>
Product Categories	<p>Could GACC add the HS Code 3504 for <u>collagen peptides</u> to its Catalogue of HS codes? This would facilitate exports of collagen peptides, as the HS code 3504 – and not the HS code 2106 that exists in the Chinese catalogue and is required by some customs authorities in China (for <u>pure collagen peptides in bulk</u>) – is used in the EU and in countries outside the EU.</p>	<p>The protein products under item No. 3504 and No. 2106 administered by the Food Safety Bureau have been included in the registration system and can be declared normally.</p> <p>On the issue of product classification, please provide further detailed information of collagen peptide products, and the Food Safety Bureau will negotiate with the relevant departments and make a judgment before replying.</p>
Product categories	<p>There are several categories to register under the same Chinese code, for example: powdered beverage, solid</p>	<p>At the time of registration, the corresponding CIQ code can be determined based on ‘processing technique’ and ‘product composition’.</p>

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
	beverage, other beverage. How can they be distinguished in order to register?	
<b>SCOPE</b>		
Scope	Could GACC publish an official note or guidance confirming that duty free products – particularly Hainan duty free – are not subject to Decree 248, in order to offer greater legal certainty to companies that this will remain the case over time?	At present, duty-free products and commercial samples that are determined not to enter the market for circulation or consumption do not need to be registered in China.  Please provide the Customs Declaration Number of the product, of which the local customs office requires registration number, and GACC will coordinate with the local customs for verification.
Scope	In December 2021, GACC indicated that commercial samples would be exempted from the obligations of Decree 248. Yet, in practice, local customs in China require a registration number for commercial samples.  Can GACC issue a public circular confirming that commercial samples do not fall under the scope of Decree 248?	
Scope	Does this decree apply to products sold through electronic commerce?	
Scope	Does this decree apply to products destined for export to a third country in transit through China?	
<b>LABELLING</b>		
Labelling	Can the Chinese registration number be indicated by adhesive stickers/labels?	The GACC Decree No.248 does not stipulate the method of marking the registration number, individual enterprises can determine the applicable method for marking as appropriate, such as printing, sticking label, inkjet printing, etc., as long as it comply with the relevant

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Topics <i>One per question</i>	Question	Answer
		<p>provisions of &lt;the National Food Safety Standard General Rules for the Labeling of Prepackaged Foods GB7718&gt;.</p> <p>The Chinese labels of imported infant formula powder, health food and special dietary food must be printed on the minimum sales package and should not be the additional label affixed to the product.</p>
Labelling	Should the registration number be included on the bottles/cans and also in the box that contains them?	<p>As specified in 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.’</p> <p>The inner and outer packaging refers to the both transport packaging and the independent packaging of the sales unit that can be sold separately.</p>
Labelling	Can the registration number be added in China through labels that are put in bonded warehouses?	<p>The Chinese labels of imported infant milk powder, health food and special dietary food must be printed on the minimum sales package and should not be the additional label affixed to the product.</p> <p>The labeling requirements for imported meat and aquatic products should be in conformity with Article 30 of the GACC Decree No.249.</p>
IT SYSTEM		
IT system	<p>The GACC has published two user manuals for CIFER (in English) and, after the publication, the system itself has undergone several changes</p> <p>For example, could China clarify the requirements for the characters that can be used during registration (e.g.: minimum number, which characters cannot be used), and</p>	<p>In the CIFER system, the mandatory fields are marked using ‘*’. Applicants should fill in the registration fields according to the actual situation.</p> <p>If the European enterprises unable complete the registration for the reason of not filling in the non-</p>

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Topics <i>One per question</i>	Question	Answer
	<p>provide more detailed explanation of the mandatory rows (it is not always clear what data is expected exactly)?</p> <p>There is compulsory data and non-compulsory data. However, in many cases, the non-compulsory data must also be filled in, otherwise the system will not allow moving on. Could China clarify and simplify this?</p>	<p>required fields, please provide specific examples and clear screenshots to the Chinese side for reference, we will fix the problem asap.</p>
IT system	<p>The CIFER system is often unavailable (404 error message or access denial even if correct login details are used).</p> <p>Could China indicate which internet browser or browser setting work best with the system?</p> <p>The system does not provide the possibility to exchange messages between the GACC and the competent authority. For example: the authority does not know exactly what needs to be fixed if something is not correct according to the GACC. Could China put in place a faster information exchange, which would enable problems to be solved more quickly (not weeks)?</p>	<p>It is recommended that the EU use Chrome browser 50 or above to log onto the CIFER system.</p> <p>For mistakes pointed out by GACC, of which the competent authority concerned does not know how to correct, please provide specific examples and corresponding screenshots to facilitate the Chinese side to resolve the problem.</p>
IT system	<p>The CIFER system has been upgraded several times over the last months including after entry into force of Decree 248 on 01.01.2022. Could China publish one single and updated CIFER manual (in English) and organise a CIFER training (in English) for EU competent authorities and business organizations?</p>	<p>The latest User Operation Manual (English version) of the CIFER system will be released recently.</p> <p>If the EU intends to hold online training on the updated CIFER system, the Chinese side is willing to send experts to attend the training and answer relevant questions.</p>
IT system	<p>Several companies have tried to contact the official GACC dedicated email address (<a href="mailto:eport@chinaport.gov.cn">eport@chinaport.gov.cn</a>) - which is the only email address available in the “Contact us” page of the CIFER platform) concerning technical issues with their registration. They received a standard reply with a CIFER manual and a recommendation to follow the guidance provided in the CIFER manual. This</p>	<p>China will continue to upgrade and optimize the CIFER system and User Operation Manual to ensure that most enterprises can use the system smoothly. For the few enterprises and individual problems, the Chinese side suggests that the enterprises concerned regularly or irregularly feedback the specific issues through the European Union or the competent authority of their own</p>

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<p><b>Topics</b> <i>One per question</i></p>	<p><b>Question</b></p>	<p><b>Answer</b></p>
	<p>did not help them resolve their particular problem. We understand that reaching the hotline by phone is much more efficient, but communications by phone can only take place in Mandarin, which most SMEs do not master.</p> <p>Could GACC provide a hotline phone number in English?            Could GACC confirm that EU Member States and businesses should use the following e-mail address as Decree 248 contact point <a href="mailto:mxjciq@163.com">mxjciq@163.com</a> (or confirm what is the Decree 248 contact point email to be used)</p>	<p>country/region via the current operating mode and working channel to the Chinese side, and GACC will respond positively as soon as possible.</p>
<p>TRANSLATION</p>		
<p>Translations</p>	<p><i>Note: request for translation of the following documents was sent to GACC on 5 May - GACC reply still pending</i></p> <p><b>Meat and meat products:</b></p> <p>Attachment 2_1_1 Application for registration of overseas production manufacturers of imported meat and meat products</p> <p>Attachment 4_1_2 Registration requirements for overseas production manufacturers of imported meat products and key points for comparison and inspection</p> <p>Attachment 7_1_1 Application for registration renewal of overseas manufacturers of imported meat and meat products</p> <p><b>Dairy products:</b></p> <p>Attachment 2_3_1 Application form for registration of overseas officially recommended manufacturers of imported dairy products</p> <p>Attachment 2_3_2 Application form for registration of overseas officially recommended manufacturers of imported pasteurized milk</p>	<p>At present, the English version of the application forms referred in the question are available in the CIFER system, the applicants can apply for registration directly through the CIFER system.</p>

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<p><b>Topics</b> <i>One per question</i></p>	<p><b>Question</b></p>	<p><b>Answer</b></p>
	<p>Attachment 2_3_3 Application form for registration of overseas officially recommended manufacturers of imported formula milk products for infant and young children</p> <p>Attachment 4_3_3 Registration conditions of overseas manufacturers of imported dairy products (excluding pasteurized milk and formula milk products for infant and young children) and key points of comparison and inspection</p> <p>Attachment 7_3_1 Application for registration renewal of overseas officially recommended manufacturers for imported dairy products</p> <p>Attachment 7_3_2 Application for registration renewal of overseas officially recommended manufacturers for imported pasteurized milk</p> <p><b>Casings:</b></p> <p>Attachment 2_1_2 Application for registration of overseas manufacturers of imported casings</p> <p>Attachment 7_1_2 Application form for registration renewal of overseas manufacturers of imported casings</p> <p><b>Bee products:</b></p> <p>Attachment 2_1_4 Application for registration of an overseas manufacturer of imported bee products</p> <p>Attachment 4_1_5 Registration requirements for overseas manufacturers of imported bee products and key points for comparison and inspection</p> <p>Attachment 7_1_4 Application for registration renewal of overseas manufacturers of imported bee products</p> <p><b>Special dietary foods:</b></p>	

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<p><b>Topics</b> <i>One per question</i></p>	<p><b>Question</b></p>	<p><b>Answer</b></p>
	<p>Attachment 2_3_5 Application form for registration of overseas officially recommended manufacturers of imported special dietary foods</p> <p>Attachment 4_3_5 Registration conditions of overseas manufacturers for imported special dietary foods and key points for comparison and inspection</p> <p>Attachment 7_3_5 Application for registration renewal of overseas officially recommended manufacturers for imported special dietary food</p> <p><b>Functional foods:</b></p> <p>Attachment 2_3_4 Application form for registration of overseas officially recommended manufacturers of imported functional foods</p> <p>Attachment 7_3_4 Application for registration renewal of overseas officially recommended manufacturers for imported functional foods</p> <p><b>Plant-derived food:</b></p> <p>Attachment 2_2 Application form for registration of an overseas officially recommended production manufacturers for imported plant-derived food</p> <p>Attachment 7_2 Application for registration renewal of overseas officially recommended manufacturers for imported plant-derived food</p> <p><b>Others:</b></p> <p>Attachment 11 Application for registration of self-applied overseas manufacturers of imported foods</p> <p>Attachment 13 Application for registration renewal self-applied overseas manufacturers of imported foods</p>	

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
<p>Translations</p>	<p>If available, could China share the translations in English of the following GBs standards (if available):</p> <p>For casings: GB/T 7740</p> <p>In category of the dietary products category:</p> <ul style="list-style-type: none"> <li>o GB 25596-2010 (infant formulas for special medical purposes)</li> <li>o GB 22570-2014 (food supplements)</li> <li>o GB 29922-2013 (food for special medical purposes)</li> <li>o GB 24154-2015 (sports nutrition)</li> <li>o GB 8950-2016 (canned foods)</li> <li>o GB 12695-2016 (hygienic production of beverages)</li> </ul> <p>In the category of functional food:</p> <ul style="list-style-type: none"> <li>o GB 17405-1998 (functional foods)</li> <li>o GB/T 27320 (food protection in food processing establishments)</li> <li>o T/CNFIA001-2017 (General Guide for Food Preservation Periods)</li> </ul>	<p>GACC does not have the English translation of these national standards.</p>
<p>Translations</p>	<p>Language problems are a constant problem when using the system in English. Many of the drop-down lists (e.g.: HS/CIQ) and the error messages are in Chinese, which often makes the system difficult to use.</p> <p>There is a checklist (Registration Conditions and Control Inspection Points of Overseas Manufacturers of Imported Food) for each food category. These are required to be filled in and uploaded, but the system does not always provide them in English.</p> <p>We would like to ask that the check lists for all food categories in English are provided in advance. It would</p>	<p>At present, only a few webpage content of the CIFER system does not have its corresponding English version, including commodity names, CIQ names, etc. This is because there is no official English translation for these names.</p>

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<b>Topics</b> <i>One per question</i>	<b>Question</b>	<b>Answer</b>
	<p>make the whole process easier if we were aware of the requirements in advance.</p> <p>We would like to get information about where the Chinese requirements (mainly standards) that are indicated in the checklists are available in English.</p>	
<p>Translations</p>	<p>Could China harmonize the checklists on the CIFER platform? For example, the two checklists for dairy products and the checklist for fish are written only in English; the checklist for beekeeping products appears in the Chinese/English version, with English version underlined and written in red, also in point 12.2, there is a part in the text without an English translation; the checklist for meat appears in the Chinese/English version and the checklist for meat products appears in the Chinese/English version, but points 8. and 9. are not translated.</p>	<p>As requested, GACC has updated the checklists for bee products, meat and meat products in the CIFER system.</p>