



SPICES BOARD
(Ministry of Commerce and Industry
Government of India)
Sugandha Bhavan
N.H. By-pass
P.B. No. 2277
Palarivattom P.O.
Cochin - 682 025, India

स्पाइसेस बोर्ड
(वाणिज्य एवं उद्योग मंत्रालय,
भारत सरकार)
सुगन्ध भवन
एन. एच. बाइपास
पी. बी. नं. 2277
पालारिवट्टम पी.ओ.
कोचिन - 682 025, भारत

परिपत्र संख्या: 19/2021

13 दिसंबर, 2021

विषय: चीनी जनवादी गणराज्य द्वारा निर्धारित पंजीकरण विनियमों से संबंध में प्रायः पूछे जानेवाले
प्रश्न-भाग-2- बाबत

यह, सीमाशुल्क के सामान्य प्रशासन, चीनी जनवादी गणराज्य (जीएसीसी) द्वारा लगाए गए पंजीकरण अपेक्षाओं से संबंधित स्पाइसेस बोर्ड का परिपत्र सं.13/2021 दिनांक 22 अक्टूबर, 2021 और चीनी जनवादी गणराज्य द्वारा निर्धारित पंजीकरण नियमों से संबंधित प्रायः पूछे जाने वाले प्रश्न संलग्न किए परिपत्र सं.16/2021 दिनांक 29 नवंबर, 2021 के संदर्भ हैं।

इस संबंध में बोर्ड को पणधारियों से पंजीकरण विनियमों से संबंधित स्पष्टीकरण के लिए अधिक अनुरोध प्राप्त हो रहे हैं। बोर्ड ने बीजिंग के भारतीय राजदूतावास के ज़रिए जीएसीसी, चीन से इन प्रश्नों को उठाया और प्राप्त हुए प्रतिक्रिया अनुबंध I, अनुबंध II और अनुबंध III के रूप में संलग्न हैं।

अनुबंध I: जीएसीसी के व्याख्यान के आधार पर भारतीय राजदूतावास द्वारा तैयार किए गए उत्तर

अनुबंध II: यूरोपीय संघ के देशों के सवालों के जीएसीसी का जवाब

अनुबंध III: भारतीय राजदूतावास, बीजिंग द्वारा साझा की गई व्याख्याओं और एफएक्यू का सारंश

यह आपकी जानकारी और आवश्यक कार्रवाई के लिए है।

(ह.)

निदेशक (विपणन)

सेवा में,

मसाले और मसाला उत्पादों के सभी निर्यातक

(फाइल सं.-MKT-QR/001/2020-विपणन-18053 से जारी)

Clarifications on queries regarding GACC order No. 248, 249

1. Is the registration requirement applicable only for manufacturer exporters? What are the conditions as per order no 238 & 249 for a merchant exporter to China?

Ans: As per the regulations, production, processing and storage entities responsible for exporting products to China need to be registered with GACC. No registration is required for room temperature transit warehouses that are not involved in processing, packaging or repacking, and exporters who are not involved in any manufacturing, processing and storage activities. These regulations also do not cover manufacturers engaged in the production, processing, and storage of food additives and food-related products.

2. Is there any SOP for export to China after implementation of the registration ?

Ans: No particular SOP provided so far.

3. Is there any provision to check the status of registration with GACC ?

Ans: Enterprises can log in on the registration system (<https://cifer.singlewindow.cn/>) It can also be accessed through the following path: China International Trade Single Window (<https://www.singlewindow.cn/>) to check the status of registration application or check the lists published on official website of the Food Safety Bureau of GACC.

4. Exporters attempting to apply for registration directly through the portal have informed that the data submitted is getting deleted once logged out and has to re entered repeatedly. May pls guide.

Ans: Enterprises can register multiple products at the same time. Please note that after filling in the information of each product, enterprises need to click on 'temporary save'. If they do not click on 'temporary save', the previous product information filled will automatically get deleted when filling in the information of the next product.

5. During the meeting held on 30.11.2021, it was informed by the GACC officials that, the exporters can apply simultaneously for registration through the single window portal as well as through the competent authority of the exporting country. May please clarify ?

Ans: All overseas food production, processing and storage enterprises have to get themselves registered with GACC by 1 January 2022. Enterprises involved with foods falling in the 18 categories will have to be recommended for registration to GACC by the competent authority. Enterprises involved with foods not falling in the 18 categories will have to self register with GACC by completing the self registration application on the online portal <https://cifer.singlewindow.cn/> It can also be accessed through the following path: China International Trade Single Window (<https://www.singlewindow.cn/>)

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After 1 January 2022, all remaining unregistered enterprises falling in the 18 categories will also have access the single window portal to register themselves after which the material uploaded will be evaluated and approved by the competent authority which will then assign an account to the enterprise. (GACC will provide account numbers to the competent authorities) The applications will then be assessed and evaluated by GACC. Process for enterprises involved with foods not falling in the 18 categories of foods will remain the same.

6. Whether GACC will provide any acknowledgment for the registration applications submitted through the Embassy. If so by when?

Ans: GACC is speeding up review and evaluation of the lists submitted through Embassies. Approved lists will be published on the website of GACC in December 2021.

7. The English version of orders 248 & 249 may pls be shared.

Ans: The English versions of orders 248 and 249 have already been shared.

Additional inputs from Spices Board: The unofficial English translations on Decree 248 & 249 as well as related information, available in public domain, can be accessed from the following links

Decree 248:

https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Overseas%20Facilities%20Registration%20Regulation%20-%20Decree%20248_Beijing_China%20-%20People%27s%20Republic%20of_04-11-2021

Decree 249:

https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Administrative%20Measures%20on%20Import%20and%20Export%20Food%20Safety%20-%20Decree%20249_Beijing_China%20-%20People%27s%20Republic%20of_05-01-2021

Decrees 248 and 249 Status Update:

https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Decrees%20248%20and%20249%20Status%20Update%20on%20Facilities%20Registration%20and%20Food%20Safety%20Measures_Beijing_China%20-%20People%27s%20Republic%20of_05-23-2021

Interpretative Guidance on Imported Food Labeling:

https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Interpretative%20Guidance%20on%20Imported%20Food%20Labeling%20Requirements%20in%20Decree%20249%20%20_Beijing_China%20-%20People%27s%20Republic%20of_08-09-2021

Explanatory Letter on Decree 248:

https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=GACC%20Issues%20Explanatory%20Letter%20on%20Decree%20248_Beijing_China%20-%20People%27s%20Republic%20of_10-02-2021

Notes from Information Sessions on GACC Decrees 248 and 249:

https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Notes%20from%20Information%20Sessions%20on%20GACC%20Decrees%20248%20and%20249%20_Beijing_China%20-%20People%27s%20Republic%20of_10-10-2021

Aquatic products

8. For aquatic products, whether there are any changes to the existing system?

Ans: For the overseas manufacturers of four types of registered products (including meat and meat products, aquatic products, dairy products, edible bird's nest and edible bird's nest products), the registration remains valid. GACC will shift the information to the online registration system directly. For overseas manufacturers that export the above four types of products to China for the first time, the GACC will evaluate and review the food safety management system and food safety status of overseas countries (regions) to determine the corresponding inspection and quarantine requirements. Where the GACC has completed the evaluation and review, and determined the corresponding inspection and quarantine requirements, competent authorities of overseas countries/regions can recommend manufacturers of the above four types of products for registration.

9. Please provide more clarifications on labelling requirement.

(a) Whether only the registration number is to be included on the label of each inner and outer packing of aquatic food products?

(b) In case of block frozen products, whether the labels are to be included on each block of frozen seafood?

(c) Whether the label should include any other details? Please specify the labelling requirements.

Ans: For food products manufactured after 1 January 2022, the registered overseas manufacturers of the imported food shall mark their Chinese registration numbers or the registration numbers approved by the competent authority of the country (region) on the inner and outer packaging of the food and export to China. Food products manufactured before 1 January 2022 are still subject to the former requirements.

For imported fresh and frozen meat products, there shall be firm, clear and easy to distinguish Chinese and English or Chinese and export country (region) text labels on the

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inner and outer packages, indicating the following: country (region) of origin, product name, registration number of production enterprise and production batch number; The specification, place of origin (specific to state / Province / city), destination, production date, shelf life, storage temperature, etc. shall be marked on the outer package in Chinese. The destination must be marked.

For imported aquatic products, there shall be firm, clear and easy to distinguish Chinese and English or Chinese and export country (region) text labels on the inner and outer packaging, indicating the following: commodity name and scientific name, specification, production date, batch number, shelf life and storage conditions, production mode (seawater fishing, freshwater fishing, aquaculture) and production area (marine fishing area, freshwater fishing country or region, country or region where aquaculture products are located), name, registration number and address of all production and processing enterprises involved (including fishing vessels, processing vessels, transport vessels and independent cold storage) (specific to state / province / city) . The destination must be marked as China. The Chinese labels of imported health food and special food and edible food must be printed on the minimum sales package and not be pasted. If there are special identification provisions on the inner and outer packages of imported food, the relevant provisions shall prevail.

10. Whether all the enterprises applying for registration will be inspected? Or whether only a few units from one batch of applicants as recommended by the Competent Agency of the exporting country?

Ans: The GACC shall, on its own or by entrusting relevant institutions, organize a review team to evaluate and examine the overseas production enterprises of imported food applying for registration in the form of written inspection, video inspection, on-site inspection and/or their combination.

11. Is it true that from 1st January 2022, the shipments only by the exporters registered with GACC will be permitted entry into China?

Ans: From 1 January 2022, enterprises need to meet the following two requirements for exporting products manufactured after 1 January 2022 to China: 1). They should be registered with GACC and have a registration number, 2) The inner and outer packaging of the product should have the registration number given by GACC or the registration/approval number given by the Indian competent authority.

For products manufactured before 1 January 2022, the inner and outer packaging of the product should have the registration number given by GACC or the registration/approval number given by the Indian competent authority.

12. Whether shipments of exporters who have not registered, will be rejected and will be forced to be brought back to India or shipped to third country?

Ans: From 1 January 2022, shipment of products manufactured after 01.01.2022 will not be provided import clearance if the enterprises are not registered with GACC.

13. Do the Merchant exporters also need to be registered? In case of Merchant exporters, how will the registration with GACC be carried when procured from Domestic units which cater to only Indian market and are not interested in registering with GACC?

Ans: Production, processing and storage entities that are legally responsible for exporting products to China need to register in accordance with the regulations. No registration is required for room temperature transit warehouses that are not involved in processing, packaging or repacking, and exporters who are not involved in any manufacturing, processing and storage activities.

14. Will the registered units/warehouses undergo verification/ physical inspection/food safety audits by Indian/Chinese authorities?

Ans: The GACC shall, on its own or by entrusting relevant institutions, organize a review team to evaluate and examine the overseas production enterprises of imported food applying for registration in the form of written inspection, video inspection, on-site inspection and/or their combination.

15. Is it possible for exporter to register directly with GACC? If so what is the procedure for the same?

Ans: All overseas food production, processing and storage enterprises have to get themselves registered by 1 January 2022. Enterprises involved with foods falling in the 18 categories will have to be recommended for registration to GACC by the competent authority. Enterprises involved with foods not falling in the 18 categories will have to self register with GACC by completing the self registration application on the online portal <https://cifer.singlewindow.cn/> It can also be accessed through the following path: China International Trade Single Window (<https://www.singlewindow.cn/>)

After 1 January 2022, all remaining unregistered enterprises falling in the 18 categories will also have access the single window portal to register themselves after which the information uploaded will be evaluated and approved by the competent authority which will then assign an account number to the enterprise (GACC will provide account numbers to the competent authorities). The applications will then be assessed and evaluated by GACC. Process for enterprises involved with foods not falling in the 18 categories of foods will remain the same.

16. Will there be any preferential import clearance facility for registered exporters with GACC.

Ans: No information available.

17. What if there containers are shipped from India prior to 31st Dec 2021 and reach Chinese ports after 1st January 2022? Would they be allowed to be cleared if Indian exporters are not register until then?

Ans: From 1 January 2022, enterprises need to meet the following two requirements for exporting products manufactured after 1 January 2022 to China: 1). They should be registered with GACC and have a registration number, 2) The inner and outer packaging of the product should have labelling in Chinese and English with the registration number given by GACC or the registration/approval number given by the Indian competent authority.

For products manufactured before 1 January 2022, the inner and outer packaging of the product should have labelling in Chinese and English with the registration number given by GACC or the registration/approval number given by the Indian competent authority.

18. Clarification is required for:

a) How registration will be done for already existing four categories. Whether they will also undergo review and recommendation process.

Ans: For the overseas manufacturers of four types of registered products (including meat and meat products, aquatic products, dairy products, edible bird's nest and edible bird's nest products), the registration remains valid. GACC will shift the information to the online registration system directly.

b) Whether separate registration is required by same food business operator for different products.

Ans: Yes. A production site can apply for multiple registration numbers in China for different product categories, and one company can also apply for multiple registration numbers in China for different products. But multiple production sites are not allowed to use one registration number in China. Also, multiple processing companies are not allowed to use one registration number in China.

c) Whether the consignments of overseas enterprises once registered by GACC will be cleared without testing at the point of entry in China.

Ans: No information available.

d) Who all will be the entrusting relevant institution for inspection.

Ans: No information available.

e) Inspection charges and who will bear it.

Ans: No information available.

f) What will be the fees for registration.

Ans: No charge.

g) Details of FSMS followed by GACC.

Ans: No information available.

h) Why labelling on inner packaging is required in case of bulk/wholesale export or the products which is not be sold in loose as outer packaging is sufficient in case of bulk/wholesale products.

Ans: From 1 January 2022 onwards, enterprises need to meet the following two requirements for exporting products manufactured after 1 January 2022 to China: 1). They should be registered with GACC and have a registration number; 2) The inner and outer packaging of the product should have labelling in Chinese and English with the registration number given by GACC or the registration/approval number given by the Indian competent authority. For products manufactured before 1 January 2022, the inner and outer packaging of the product should have labelling in Chinese and English with the registration number given by GACC or the registration/approval number given by the Indian competent authority. Other than products with special requirements, the labels on the smallest package must comply with Chinese requirements.

19. If the product items belong to categories which are not part of the 18 categories mentioned in No. 248, the enterprises need to do self registration- does this cover items where there are existing protocols between India and China- such as grapes, mangoes, etc. Can the exporting enterprises start doing self-registration?

Ans: The enterprise will have to check requirements of each HS Code on the single window portal.

20. If the items belong to the 18 categories and are not part of the 46 items mentioned in Annexure 1 which is specific for India, can we still send exporters list to GACC from the authoritative agency in India? (we need specific examples of such products- a list of all exports from India to China of agricultural products for the year 2020 is attached herewith. Mission is also making an assessment of what kind of registration is required for each of these items and will be sharing a feedback soon)

Ans: Mission has raised the query with GACC. GACC has requested to provide HS Code of each product.

21. We are still collecting information on exporters list for some of the items in the Annexure 1, can GACC extend the date for submission of exporters list to 31 January 2021?

Ans: No information available.

22. For those items where the exporters list has been provided to the Chinese side, when will the enterprises get registration details? Importers in China are anxious and are not taking orders without the registration number and imports for January 2022 should have left India by now- since registration numbers are

not available, can we have a lag time of 45 days between ensuring all enterprises which have applied for have got the registration numbers and implementation of the requirements as per Article 248?

Ans: GACC is speeding up review and evaluation of the lists submitted through Embassies. Approved lists will be published on the website of GACC in December 2021. Enterprises can log in on the registration system (<https://cifer.singlewindow.cn/>) It can also be accessed through the following path: China International Trade Single Window (<https://www.singlewindow.cn/>) to check the status of registration application or check the lists published on official website of the Food Safety Bureau of GACC. As per the regulations, only shipment of products manufactured after 01.01.2022 will not be provided import clearance if the enterprises are not registered with GACC from 1 January 2022 onwards.

23. We have heard that some countries have already received registration for their companies. Can you provide an expected time by which registration would be completed?

Ans: GACC is speeding up review and evaluation of the lists submitted through Embassies. Approved lists will be published on the website of GACC in December 2021. Enterprises can log in on the registration system (<https://cifer.singlewindow.cn/>) It can also be accessed through the following path: China International Trade Single Window (<https://www.singlewindow.cn/>) to check the status of registration application or check the lists published on official website of the Food Safety Bureau of GACC.

24. Can you arrange a separate session in English for some of our leading enterprises on how to self register in the CIPHER system so that they can clarify their questions and doubts? The English registration for CIPHER system is available at <https://cifer.singlewindow.cn/>

Ans: No information available.

25. For those items which are not part of the 18 mentioned categories, can the competent authorities still send a recommended list for GACC?

Ans: Recommendation from competent authority for registration is only required for products falling under the 18 categories of food.

26. Can you give us more clarifications on the labeling requirement?

Ans: For food products manufactured after 1 January 2022, the registered overseas manufacturers of the imported food shall mark their Chinese registration numbers or the registration numbers approved by the competent authority of the country (region) on the inner and outer packaging of the food and export to China. Food products manufactured before 1 January 2022 are still subject to the former requirements.

For imported fresh and frozen meat products, there shall be firm, clear and easy to distinguish Chinese and English or Chinese and export country (region) text labels on the

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inner and outer packages, indicating the following: country (region) of origin, product name, registration number of production enterprise and production batch number; The specification, place of origin (specific to state / Province / city), destination, production date, shelf life, storage temperature, etc. shall be marked on the outer package in Chinese. The destination must be marked.

For imported aquatic products, there shall be firm, clear and easy to distinguish Chinese and English or Chinese and export country (region) text labels on the inner and outer packaging, indicating the following: commodity name and scientific name, specification, production date, batch number, shelf life and storage conditions, production mode (seawater fishing, freshwater fishing, aquaculture) and production area (marine fishing area, freshwater fishing country or region, country or region where aquaculture products are located), name, registration number and address of all production and processing enterprises involved (including fishing vessels, processing vessels, transport vessels and independent cold storage) (specific to state / province / city) . The destination must be marked as China. The Chinese labels of imported health food and special food and edible food must be printed on the minimum sales package and not be pasted. If there are special identification provisions on the inner and outer packages of imported food, the relevant provisions shall prevail.

27. Are there additional requirements for registration of spices and other items under TCM category? If yes, can you provide the details.

Ans: The enterprise should check requirements of each HS Code on the single window portal. All TCM related products imported by India to China require self registration on the single window portal.

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Reply to questions regarding Decree No. 248 of the General Administration of Customs

1. Implementation time

Starting from 1 January 2022, overseas production companies exporting food products to China shall obtain registration with the General Administration of Customs.

2. The scope of registration

(1) Do all the companies involved in the production process have to register?

Regulations on Registration and Administration of Overseas Manufacturers of Imported Food of the People's Republic of China (Decree No. 248 of the General Administration of Customs, hereinafter referred to as the "Registration Regulations") aims to ensure the safety of food exported to China.

For the production, processing and storage entities that are legally responsible for exporting products to China need to register in accordance with the "Registration Regulations". No registration is required for room temperature transit warehouses that have not undergone any processing, packaging or repacking, and exporters who are not involved in any manufacturing, processing and storage activities.

(2) Can a food operator with multiple manufacturing plants under one company name (and one business license) register only once, and remain valid for all plants.

A production site can apply for multiple registration numbers in China for different product categories, and one company name can also apply for multiple registration numbers in China for different products. But multiple production sites are not allowed to use one registration number in China, Alternatively, multiple processing companies are not allowed to use one registration number in China.

(3) Can establishments start both processes (government registration (art. 8) and self-registration (art. 9) at same time to secure registration?

Yes they can.

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For overseas production enterprises of 18 categories of imported food listed in Article 7 of the "Registration Regulations", their registration system account shall be assigned by the competent authority of the country (region) where they are located, and follow the procedures of the registration management system for imported food overseas production enterprises (hereinafter referred to as the "registration system") to submit application.

The registration system account of the overseas competent authority shall be assigned by the General Administration of Customs after contacting them for confirmation.

Overseas food production companies other than Category 18 should apply for an account through the registration system by themselves, and submit applications for company registration according to the registration system process.

3. Registration regarding the HS code

The "Product Category and HS Code, Inspection and Quarantine Code Table" of the products involved in the registration of imported food overseas production enterprises can be checked in the registration system within this week. Click – Home-Menu-Product Category Query.

Registration system website: <https://cifer.singlewindow.cn/>

It can also be accessed through the following path: China International Trade Single Window (<https://www.singlewindow.cn/>) portal homepage or Standard Edition Application-Imported Food Overseas Production Enterprise Registration Management System.

4. 18 Types of food registration issues

(1) When will EU member states receive feedback from the General Administration of Customs for the information submitted before 31 October 2021?

Currently, China Customs are stepping up relevant audits and confirmations, and the EU member states submitted lists before 31 October will gradually release in the registration system in December.

(2) Can GACC confirm what happens to companies not yet formally registered by 1 January 2022?

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Reply: As of 1 January 2022, overseas manufacturers of imported food that have been registered and given a Chinese registration number shall, when declaring imported food, fill their Chinese registration number accordingly in the “Overseas Manufacturers Registration of Imported Food” that listed under the “Product Qualification” of the customs declaration form. Oversea manufacturers that fail to fill in the Chinese registration number shall be deemed as unregistered. Foods produced by unregistered manufacturers will not be accepted for import declarations.

The General Administration of Customs of the People’s Republic of China (GACC) will make every effort to prevent interruption or bottlenecks from happening to the food trade with China. We also call for positive coordination from the competent authorities of EU and its member states to complete the registration applications and approvals of all existing trading manufacturers by the end of this year.

(3) Implementation issues

1. For the overseas manufacturers of four types of registered products (including meat and meat products, aquatic products, dairy products, edible bird’s nest and edible bird’s nest products), the registration remains valid.

2. For overseas manufacturers that export the above four types of products to China for the first time, the GACC will, in accordance with Articles 11 to 17 of the Administrative Measures of the People’s Republic of China on the Registration and Administration of Imported and Exported Food Safety, evaluate and review the food safety management system and food safety status of overseas countries (regions) to determine the corresponding inspection and quarantine requirements. Where the GACC has completed the evaluation and review, and determined the corresponding inspection and quarantine requirements, competent authorities of overseas countries/regions can recommend manufacturers of the above four types of products for registration

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according to relevant requirements of Article 8 of the Regulations of the People's Republic of China on the Registration and Administration of Overseas Manufacturers of Imported Food ("Regulations").

3. For overseas manufacturers of the following 14 types of products: casings, bee products, eggs and egg products, edible oils and fats, stuffed pastry products, edible grains, milled grain industry products and malt, fresh and dehydrated vegetables and dried beans, condiments, nuts and seeds, dried fruits, unroasted coffee beans and cocoa beans, food for special dietary purposes, and functional food, that have exported products listed in the Catalog of Existing Imported Food to China since 1 January, 2017, competent authorities of their countries/regions can add them into the List of Recommended Overseas Manufacturers for Registration of Imported Food before November 30, 2021, and submit it to the Bureau of Import and Export Food Safety, GACC together with the Declaration of Compliance of the Recommended Registered Enterprise (Reference Format) (see the Letter of the Food Safety Bureau [2021] No. 353 for details). The GACC shall promptly review and approve the registration of relevant manufacturers on the list submitted on time.

4. For those who fail to submit the list of relevant manufacturers on time or export the aforementioned 14 types of products to China for the first time, as of January 1, 2022, relevant overseas manufacturers of imported food shall apply for registration in accordance with relevant requirements listed in Article 8 of the Regulations.

5. Where there are agreements between relevant competent authorities of foreign countries/regions and the GACC on the application methods and materials, the registration application of 18 types of imported food by overseas manufacturers listed in Article 7 of the Regulations shall be submitted through the registration system. Their registration system accounts shall be assigned by the competent authorities of the country (region) where they are located, and then they shall submit the registration application in accordance with the

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registration procedure. The accounts of overseas competent authorities shall be assigned by the GACC after contacting them for confirmation.

6. For overseas manufacturers of imported food that have been registered before January 1, 2022, where information and materials for inspection are incomplete, relevant overseas competent authorities and manufacturers can submit the supplements through the registration system before 30 June, 2023.

5. Website problem

Reply: Up to 30 November 2021, data of overseas dairy enterprises that applied for registration via <http://spj.customs.gov.cm/cifer> are still valid, and they will be uploaded to <https://cifer.singlewindow.cn>. New applications via <http://spj.customs.gov.cm/cifer> will not be accepted as of 1 December 2021.

Data confidential problem

Reply: The GACC will ensure the security of information and document data uploaded by manufacturers through the registration system in accordance with relevant regulations.

The registration system identifies users through accounts and passwords to ensure information security. The upload and download of documents are not open to the public. Overseas manufacturers and competent authorities where they are located must log in to the registration system with a registered account and password before uploading and downloading documents. Overseas manufactures can view information filled in and documents submitted only. The account and password shall be kept properly. Please do not disclose them to the third party, or use them to log in to the third-party platforms.

Regarding the claim of “anyone can download the files uploaded to the platform during the registration” you mentioned, further detailed clarification is needed for giving feedback.

When is the registration system operational?

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Reply: The registration management system for overseas manufacturers of imported food has been put into operation on 1 November, and it is running well. A number of manufacturers have successfully registered through the system.

Allocation of Registration Numbers

Reply: Food manufacturers that have not yet exported products to China can submit application for registration through the system. The Chinese registration number is related to the product category of overseas manufacturers, which means different products by the same manufacturers may have different Chinese registration numbers. One manufacturing site can apply for multiple Chinese registration numbers for different product categories, but it is not allowed for multiple manufacturing sites to use one and the same Chinese registration number, or multiple processing enterprises to use one and the same Chinese registration number. There is no deadline for obtaining the Chinese registration number from the GACC.

Documentations needed for self-registration

Reply: As for information provided by manufacturers who apply for registration by themselves, the main manufacturing/processing technology are mandatory fields, raw materials/ingredients, countries of origin and product composition are optional fields that manufacturers are encouraged to fill in, which is helpful for China Customs to review.

The English version of the registration system has been launched. Applicants can check the process status after submitting the application through the system. The function to search the Chinese registration number of registered manufacturers will be introduced soon. If overseas manufacturers fail to be granted the registration number by their local competent authorities of food safety, they are allowed to use their own business registration number, tax

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number, and value-added tax number instead, which can be used as their identification numbers to apply for an account in the registration system.

As for the registration system, any constructive suggestions for improvement are welcome.

Change of Registration Number

Reply: According to Article 19 of the Regulations, manufacturers shall not apply for adjustments to related registration items based on the ways of change where they change their manufacturing sites, legal representatives, or registration numbers granted by the country (region) where they are located. Instead, they shall submit new registration application and corresponding materials via the ways of application in accordance with the Regulations.

After the new registration application is approved, the former Chinese registration numbers will automatically become invalid, and the former registration qualification will be cancelled. The customs clearance and declaration will be unaffected before the new registration number is approved; The new Chinese registration number shall prevail for customs clearance when it is approved.

Registration Guideline

Reply: For the registration guideline and related appendices of overseas manufacturers of imported food, please refer to the GACC website: “Internet + Customs” - Administration Approval - Registration of Overseas Manufacturers of Imported Food – “Guidelines for Registration of Overseas Manufacturers of Imported Food”.

New labelling requirements

Timelines for compliance with new labelling requirements

Reply: Registered overseas manufacturers of imported food shall mark their Chinese registration numbers or the registration numbers approved by the

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competent authority of the country (region) on the inner and outer packaging of the food that manufactured as of 1 January 2022 and exported to China. The labels on the packaging of food exported to China that manufactured before that date are still subject to the former requirements.

Other problems

Reply: Except for functional food and food for special dietary purposes with special requirements for labelling, pre-packaged food must comply with relevant requirements. Others that are not prohibited can be labelled according to the actual situation, and the labels on products that eventually enter the market must meet the requirements of relevant Chinese laws and regulations and national standards for food safety.

Other than products with special requirements, the labels on the smallest sales package must comply with Chinese requirements.

Annexure III

Summary of the interpretations and FAQs shared by Indian Embassy, Beijing

- i.* The orders 248 and 249 will be put into effect from **1 January 2022**. As per these new regulations, all overseas food production, processing and storage enterprises have to get themselves registered with GACC by **1 January 2022**. From **1 January 2022**, shipment of products manufactured after **1 January 2022** will not be provided import clearance if the enterprises are not registered with GACC.
- ii.* GACC has introduced an online registration portal. Guidelines for using this portal have been shared with DoC vide email on 09.12.2021.
- iii.* GACC has divided the food products into within 18 categories and outside of 18 categories. *[18 categories: meat and meat products, casings, aquatic products, dairy products, bird's nests and bird's nest products, bee products, eggs and egg products, edible oils and fats, oilseeds, stuffed pasta products, edible grains, milled grain industry products and malt, fresh and dehydrated vegetables and dried beans, condiments, nuts and seeds, dried fruits, unroasted coffee beans and cocoa beans, foods for special dietary purposes, and functional foods.]* **Enterprises involved with foods falling within 18 categories need to be recommended for registration by the competent authority.** Embassy has already sent lists of exporters with EPC's recommendation to GACC.
- iv.* **Enterprises falling in the 18 categories can also initiate registration application on the online registration portal and upload relevant documents. The application will be scrutinized by the competent authority which will allot an account number to the application on the portal to recommend it to GACC. These recommended applications with account numbers will then be assessed and evaluated by GACC. (User names and passwords for accounts of EPCs provided by GACC have been shared by the Mission on 09.12.2021.)**
- iv.* **Enterprises involved with foods falling outside of these 18 categories have to self register with GACC by completing the self registration application on the online portal. They do not need recommendation/account number from the competent authority.**
- v.* **For exporters of four types of registered products (including meat and meat products, aquatic products, dairy products, edible bird's nest and**

edible bird's nest products) the previous registration remains valid. GACC will shift the information to the online registration system directly.

- vi. **EPCs may please note that food exports need not be paused or stopped. These orders only affect consignments of food products manufactured after 1 January 2022.**
- vii. **Post 1 January 2022, to export products manufactured before 1 January 2022, enterprises only need to ensure that both the inner and outer packaging of the product should be labelled in Chinese and English language. The product labelling can either carry the old registration number given by GACC or the approval number given by the Indian competent authority. To export products manufactured after 1 January 2022, enterprises have to be registered with GACC.**
- viii. **Under these new regulations, both the inner and outer packaging of the product should be labelled in Chinese and English language. The product should either carry the registration number given by GACC or the approval number given by the Indian competent authority. Even the smallest individual package of the product will be required to be labelled as per the requirements detailed in Order No. 249.**
- ix. **As per these regulations, GACC may choose to evaluate and examine the enterprises through written inspection, video inspection, on-site inspection and/or their combination.**
- x. **An enterprise involved in export of different kinds of food products has to apply for multiple registration numbers with GACC for the different products. Multiple food production, processing or storage enterprises are not allowed to use one registration number in China.**
- xi. **Registration for grapes and mangoes is not required under regulation No. 248.**
- xii. **For items which are part of the 18 categories and but not part of the 46 items mentioned in NV 353 Annexure 1 (please refer the last page, P.No 3) which is specific for India, GACC has requested to provide HS Code of such products to advise mode of registration. The enterprises can also check the mode of registration by doing a product type query using the 8 digit HS codes on the online registration portal before proceeding with the registration application.**
- xiii. **As per the regulations, production, processing and storage entities responsible for exporting products to China need to be registered**

with GACC. No registration is required for room temperature transit warehouses that are not involved in processing, packaging or repacking, and exporters who are not involved in any manufacturing, processing and storage activities. These regulations do not include the production, processing and storage enterprises of food additives and food related products.

Items mentioned in NV 353 Annexure 1 (46 nos)

Country/Region	Plant Derived Food
India	<u>Star anises, thyme leaf (powder), soybean powder, cardamoms, dried arecae semen, dried shelled walnut, dried soybean powder, dried cluster bean, dried cowpea and kidney bean, dried mung beans, dried pea, dried cashew nut, dried chickpea, safflower seed, pepper, trigonellae semen seed, peanut, curcumae longae rhizoma, shinapis semen, curry powder, cuminum Seed, chili powder, dried pepper, orchid seed (scientific name: Ocimum basilcum, also known as basil seed), cotton seed, buckwheat powder, celery seed, ginger, dill powder, fresh or chilled green onion, fresh or chilled cowpea and kidney bean (shelled or unshelled), fresh or chilled leek, fresh or chilled <i>Allium chinense</i> G.Don, fresh or chilled yam, fresh or chilled onion, fennel seeds, flaxseed, caraway seed, coriander seed, sesame, fresh or refrigerated bitter gourd, stuffed pasta, edible vegetable oil</u>