



F56/21: China Registration of Food Manufacturing Premises

Animal Products, Plant Products and Processed Food

8 December 2021

For Your Information

1 Background

- (1) In April 2021, China's General Administration of Customs (GACC) published the [Regulations of the People's Republic of China on the Registration and Administration of Imported Food Overseas Production Enterprises](#) (Decree 248). The regulation comes into effect on 1 January 2022.
- (2) This FYI replaces F51/21 China: Registration of Food Manufacturing Premises and F52/21: Guidance on Self-Registration for Manufacturers of Food Exported to China, and provides further information that the Ministry for Primary Industries (MPI) has learnt on the requirements of Decree 248 and its implementation process, mainly sourced through communications with GACC.
- (3) MPI will publish further FYIs if further information is available. The latest FYIs are available on the MPI webpage: [For Your Information \(FYI\) documents](#), as well as the [China](#) webpage. Operators should check these webpages frequently to ensure they are aware of the most up-to-date information.
- (4) GACC published an English [translation](#) of the regulation (for reference) in November 2021.
- (5) GACC issued an [interpretation of Decree 248](#) on 5 November 2021. This has been unofficially translated into English by the United States Department of Agriculture Global Agricultural Information Network (USDA GAIN): [GAIN Report - GACC Issues Interpretation of Decree 248](#).
- (6) This FYI covers the following information:
 - Section 2: Decree 248
 - Section 3: Clarification on implementation of Decree 248
 - Section 4: Clarification on scope of Decree 248
 - Section 5: Operators who need to apply for GACC manufacturer registration via MPI
 - Section 6: Operators who need to self-register directly with GACC
 - Section 7: Some other requirements under Decree 248

2 Decree 248

- (1) Decree 248 requires that all overseas manufacturers of specific foods that are imported to China (from all countries) need to obtain GACC registration. Food additives and food-related products (eg food packaging) are exempt from this requirement.
- (2) Under Decree 248, there are two methods to apply for registration with GACC. The registration method depends on which product category the food product that the operator manufactures for export to China comes under.
 - a) Under Article 7 of Decree 248, manufacturers that are within the scope of the following (18) product categories need to apply for registration via the Ministry for Primary Industries (MPI):
 - meat and meat products
 - casings

- aquatic products
 - dairy products
 - bird's nest and bird's nest products
 - bee products
 - eggs and egg products
 - edible fats and oils
 - stuffed pasta
 - edible grains
 - milled grain industry products and malt
 - fresh and dehydrated vegetables and dried beans
 - seasonings
 - nuts and seeds
 - dried fruits
 - unroasted coffee beans and cocoa beans
 - food for special dietary purpose
 - health food (functional food)
- b) Under Article 9 of Decree 248, manufacturers which are not within the scope of the (18) product categories in Article 7 (as identified above) need to apply for registration directly with GACC (self-registration). Operators of these manufacturing premises should refer to Section 6 below for more information about how to self-register with GACC.

3 Clarification on implementation of Decree 248

3.1 From 1 January 2022

- (1) MPI understands that from 1 January 2022, all import declarations for food that comes under the scope of Decree 248 that are presented to GACC for customs clearance must include the GACC manufacturer registration number related to Decree 248. Import declarations for food where the manufacturer is not registered with GACC will not be accepted.
 - a) MPI understands that for those 18 product categories where registration application is via MPI, the GACC registration number may be the same as the MPI-approved registration number.
- (2) GACC has confirmed that the new labelling requirement in Decree 248 (Article 15) applies to food manufactured from 1 January 2022. See Section 7 below for more information on this labelling requirement.
- (3) Operators should note that customs clearance at a China port relies on China's animal and plant quarantine measures, and so for plant products the Importing Country Phytosanitary Requirements apply.

3.2 Registration website: China Imported Food Enterprise Registration (CIFER)

- (1) GACC has advised the direct link to the CIFER website: <https://cifer.singlewindow.cn/>, and that this website can also be accessed via the new China Single Window website: <https://new.singlewindow.cn/>.
- (2) GACC has provided an English version of the CIFER website. This is accessible by clicking on the EN icon at the top right of the CIFER login page. When the EN icon shows blue, it has been selected.
- (3) On 1 December 2021, GACC published [an operation manual for CIFER](#), at this stage in Chinese only.
- (4) The CIFER website requires a user account (username and password) to be set up to enable access.

- a) Refer to Section 6.3 below for a link to a guidance document that MPI has prepared that may help with user account setup.
 - b) MPI understands that for those 18 product categories where registration application is via MPI, MPI will be able to issue the operator with their user account information. MPI will advise operators when this information is available.
- (5) GACC has advised that the CIFER website shows the status of the user's registration application/s.
 - (6) GACC has confirmed that the data in CIFER is confidential and secure, the security of which is managed by individual account names and passwords. Operators can only see the information linked to their user account/s.
 - (7) GACC has advised that the old CIFER system (<http://spj.customs.gov.cn/cifer/>) should no longer be used.
 - (8) MPI is aware of websites purporting to provide registration of overseas food manufacturers producing products for export to China. MPI urges operators to exercise caution in providing any information to these websites. MPI notes that the GACC self-registration process is not associated with a fee. Any website seeking a fee for registration is unlikely to be an official GACC website.

4 Clarification of scope of Decree 248

4.1 General scope clarification

- (1) GACC has advised that it is the production, processing and storage premises that are legally responsible for the product exported to China that need to be registered under Decree 248.
- (2) GACC has advised that the following premises do not need to register under Decree 248:
 - a) Transit ambient temperature stores that do not process, pack, or repack products.
 - b) Exporters who are not involved in the manufacture, processing, packing or storage of products.
- (3) GACC has provided an HS code search function on the new [China Imported Food Enterprise Registration \(CIFER\)](#) website to clarify some information related to the registration of the product intending to be exported to China. This function allows either an HS code or a product name (in Chinese only) to be entered.
 - a) The HS code search responds with the following information:
 - HS code - 10 digits
 - Product name (description related to HS code)
 - Inspection and Quarantine Code (CIQ code) - 3 digits
 - Inspection and Quarantine name (description related to the HS code + CIQ code combination)
 - Product Category
 - Whether the Product Category needs official registration via the competent authority of the exporting country, ie does the manufacturer need to be recommended via MPI (Article 7). If the answer is No, the manufacturer should self-register directly with GACC (Article 9).
- (4) GACC has advised that a manufacturing premises can apply for registration for multiple product categories (and therefore may receive multiple GACC registration numbers, one for each product category), but multiple premises in different locations cannot share the same GACC registration number.
- (5) Self-registration is a commercial activity and so to be confident of which product types and which processing premises and /or stores need to self-register with GACC, MPI strongly encourages exporters and operators of manufacturing premises to seek advice from their importer or agent in China.

4.2 Fruit

- (1) China registrations under phytosanitary protocols agreed with GACC (ie for avocados, apples and persimmons) remain valid and are not under the scope of Decree 248.
- (2) In addition, MPI has confirmed directly with GACC that premises that process or pack fresh fruit are not required to register under Decree 248. This is the case regardless of whether a phytosanitary protocol is in place that requires registration of packhouses for phytosanitary purposes. China registration of premises that pack or process these types of products for export to China sits with GACC's Animal and Plant Quarantine Department (APQD).
- (3) The [lists of fresh fruit, frozen fruit and vegetables that MPI sent to GACC in August 2020](#) (refer to [F6/21: China: Fresh and frozen fruit and vegetables](#)) do not appear to have been published by GACC and therefore are not expected to be used for China border clearance.
- (4) For other types of fruit products:
 - a) MPI understands that frozen fruit does not come under the scope of Decree 248, however we encourage exporters and operators of manufacturing premises that pack or process frozen fruit for export to China to seek advice from their importer or agent in China to confirm this.
 - b) For dried fruit, refer to Section 5.6 of this FYI.
 - c) MPI understands that where the fruit has been highly processed (eg fruit puree, fruit juice), it is likely to fall under the self-registration method in Decree 248 (refer to Section 6).

4.3 Vegetables

- (1) MPI understands that premises that pack or process vegetables are within scope of Decree 248 and advises operators of these premises to apply for registration under Decree 248. The method of registration will depend on the product category (refer to Section 2 (2) of this FYI).
- (2) MPI does not currently have sufficient clarity on how the ['frozen vegetables' and 'squash' lists that MPI sent to GACC in August 2020](#) (refer to [F6/21: China: Fresh and frozen fruit and vegetables](#)) relate to Decree 248.

5 Operators who need to apply for GACC manufacturer registration via MPI

5.1 General

- (1) GACC has confirmed that manufacturers who have current registrations with GACC, or that successfully register with GACC once recommended by MPI, will need to complete their registration information on the China Imported Food Enterprise Registration (CIFER) website. This may include the requirement to add further registration information required by GACC.
- (2) MPI will provide further information for this process when this information is available, including how operators can access the CIFER website (eg user account details).

5.2 Meat and meat products, aquatic products, and dairy products (including dairy-based infant and young children formula)

- (1) GACC has advised MPI that for those product categories with existing GACC registrations, ie meat and meat products, aquatic products, and dairy products (including dairy-based infant and young children formula), the current registrations remain valid at this time.

- (2) GACC has advised that the old CIFER website (<http://spi.customs.gov.cn/cifer>) is no longer available (since 30 November 2021), and that the dairy manufacturer registration information in the old CIFER system is still valid and will be transferred by GACC into the new CIFER website.

5.3 Bee products

- (1) GACC offered MPI an expedited registration process for bee products manufacturing premises for a limited period in September 2021. This was to cover historic or existing trade from New Zealand to China for bee products from 1 January 2018 to 30 September 2021.
- (2) Operators of premises who manufacture bee products for export to China should refer to the [OMAR Notification: 21/020 China Registration of Final Manufacturing Premises of Bee Products](#). (Note that this is a password protected document).
- (3) Note that the Overseas Market Access Requirement (OMAR) Notification above may be replaced in the future by another OMAR Notification, or incorporated into the China OMAR. Bee products operators should check for the latest updates on the MPI [China OMAR page](#).

5.4 Casings

- (1) MPI has submitted a list to GACC of premises eligible to process casings for export to China: [MPI List for China: Casings manufacturing premises](#).
- (2) GACC has confirmed that manufacturer registration for casings includes premises processing frozen casings (certified for export on MPI certificate template CN112) as well as premises processing salted casings (certified on the CN113).
- (3) Once GACC publishes the casings register, MPI will notify the manufacturing premises listing requirements and publish the list of premises eligible to process casings for export to China.

5.5 Edible fats and oils; milled grain industry products and malt; fresh and dehydrated vegetables and dried beans; food for special dietary purpose; health food (functional food).

- (1) For those products categories listed in Decree 248 Article 7 (refer to Section 2 (2) a) above), and for which there are no current New Zealand GACC registers, GACC offered MPI an expedited registration process for a limited period in October 2021. This was to cover historic or existing trade from New Zealand to China for these product categories from 1 January 2017 to 31 October 2021.
- (2) This expedited process was only applicable to products within these product categories in Article 7 for which New Zealand has current market access into China.
- (3) Aside from those product categories with existing GACC registrations (meat and meat products, aquatic products, and dairy products (including dairy-based infant and young children formula)), and aside from bee products and casings, New Zealand has market access into China for the following specific products within the product categories under Article 7 of Decree 248, as stipulated by GACC:
 - a) dried peas
 - b) blackcurrant seeds
 - c) borage seeds
 - d) malt
 - e) fresh or chilled broad beans (fava beans)
 - f) fresh or chilled pumpkin, winter squash and gourd (Cucurbita)
 - g) fresh or chilled celery
 - h) fresh or chilled Chinese yam

- i) fresh or chilled winged (four-angled) bean
 - j) fresh or chilled peas (whether or not in pod)
 - k) fresh or chilled perilla
 - l) flaxseed (linseed)
 - m) evening primrose seed
 - n) edible vegetable oil
 - o) food for special dietary purposes
 - p) health foods/functional foods
- (4) The expedited process for China registration has now closed, and MPI has provided the following five lists to GACC of recommended premises for China registration:
- a) [MPI List for China: Edible fats and oils manufacturing premises](#)
 - b) [MPI List for China: Milled grain industry products and malt manufacturing premises](#)
 - c) [MPI List for China: Fresh and dehydrated vegetables and dried beans manufacturing premises](#)
 - d) [MPI List for China: Food for special dietary purpose manufacturing premises](#)
 - e) [MPI List for China: Health food \(functional food\) manufacturing premises](#)
- (5) Definitions for each of the product categories are found at the bottom of each list.
- (6) These lists include New Zealand manufacturing premises that process product for export to China where:
- a) New Zealand has market access into China for the product, as listed in (3) above, and
 - b) Product processed at that premises has been exported to China between 1 January 2017 and 31 October 2021, and
 - c) The premises carries out the final processing step for the product, ie the step where the final packaging of the exposed product occurs prior to export from New Zealand, and
 - d) The operator of the manufacturing premises expressed interest to MPI in October 2021 to be included on the list, and declared that:
 - i) They can meet the relevant regulations of China and New Zealand, and
 - ii) They can meet the 'Regulations of the People's Republic of China on the Registration and Administration of Overseas Manufacturers of Imported Food' (GACC Decree 248).
- (7) GACC has advised MPI that they are working on verifying these recommended lists and that they are aiming to publish them by 31 December 2021.
- (8) For those food premises whose products listed in (3) have not been exported to China between 1 January 2017 and 31 October 2021, or for those food premises that were eligible to be recommended by MPI in October but where the operator did not submit an expression of interest (EOI):
- a) MPI understands that there will an opportunity to apply for China premises registration from January 2022.
 - b) As China's Decree 248 comes into force on 1 January 2022, the registration process will reflect GACC's implementing mechanism for this new regulation. MPI will provide further advice once this is available.

5.6 Products for which New Zealand does not have current market access into China

- (1) MPI understands that New Zealand does not have market access into China for products that fall within the following product categories, as listed in the [GACC catalogue of countries and regions exporting food products that meet assessment and review requirements and have historic trade with China](#):
- bird's nest and bird's nest products
 - eggs and egg products
 - stuffed pasta

- edible grains
 - seasonings
 - nuts and seeds
 - dried fruits
 - unroasted coffee beans and cocoa beans
- (2) These product categories appear to cover primary food products that have not been processed, or only minimally processed. MPI understands that foods that may seem to fall into one of these product categories but have been highly processed are likely to fall under the self-registration method in Decree 248 (refer to Section 6 below).

6 Operators who need to self-register directly with GACC

6.1 Introduction to self-registration

- (1) Article 9 of Decree 248 requires operators of manufacturing premises of food products that are exported to China apply for registration directly with GACC (self-register) in accordance with relevant requirements of Decree 248. This applies where the food comes under the scope of Decree 248 but where the food is not under one of the 18 products categories that need to be registered via MPI (refer to in Article 7 of Decree 248).
- (2) MPI may provide further advice regarding the process of self-registration with GACC if further information is received. However as the self-registration process is a commercial activity, MPI encourages exporters and operators of manufacturing premises to seek advice from their importer or agent in China.

6.2 Website for self-registration

- (1) GACC has advised that manufacturers can now self-register by visiting the following GACC website: <https://cifer.singlewindow.cn>. This website provides access to the China Importer Food Enterprise Registration (CIFER) website.
- (2) Refer to Section 3.2 above for more information about the CIFER website.

6.3 Guidelines for self-registration

- (1) MPI has prepared a document '[Guidance for operators to support self-registration with GACC](#)'. Operators should note that this guidance document does not include every single step in the self-registration process and that MPI bears no responsibility for any errors or misinterpretation within it.
- (2) Self-registration with GACC is a commercial activity. MPI has created the guidance document to facilitate this process due to the short timelines involved. The information in the guidance document has been prepared based on exploration of the GACC website, discussions with industry members who have successfully self-registered, MPI's previous experiences with GACC registration processes, and some advice from GACC. MPI encourages exporters and operators of manufacturing premises to seek further advice on GACC self-registration from their importer or agent in China.
- (3) Manufacturers who self-register will need to submit the following application materials:
- a) an on-line registration application which includes information such as manufacturing premises name, country where the premises is located, premises address, legal representative and contact information, contact person and contact information, registration number approved by the competent authority of the country (MPI-approved registration number), type of food products applying for registration including HS code, brand and photos of products, type of production

- premises, production and storage capacity, export trade history, some product related information such as water source, processing methods and number of employees and managers.
- b) a manufacturer identity document issued by MPI; and
 - c) a declaration that the manufacturer can meet the relevant regulations of China and New Zealand and the requirements of Decree 248. If you are using the English CIFER website, this declaration will be downloaded in English.
- (4) The 'MPI-approved registration number' used in the self-registration application is the Food Act Site Registration number, Risk Management Programme ID (RMP), Unique Location Identifier ID (ULI), Wine Standards Management Plan Registration ID (WSMP), or any other registration number approved by MPI, of the manufacturing premises. Note in some cases this registration number may have been assigned by a New Zealand territorial authority.
 - (5) Not all fields in the on-line registration application form are compulsory. Operators should make their own decisions as to which optional information they will provide to GACC.

7 Other requirements under Decree 248

7.1 Labelling

- (1) Article 15 of Decree 248 requires that registered manufacturers will need to include either their China registration number or their registration number approved by MPI on the inner and outer packaging of foods exported to China.
- (2) GACC has clarified that an inner is the separately packaged sales unit, and an outer is the transport package.
- (3) MPI understands that a carton liner is not considered as inner or outer packaging in this context.
- (4) GACC has advised that their preference is for manufacturers to use the GACC registration number on the label, however if this number has not yet been issued by GACC, the MPI-approved registration number can be used instead.
- (5) The MPI-approved registration number is the Food Act Site Registration Number, Risk Management Programme ID (RMP), Unique Location Identifier ID (ULI), Wine Standards Management Plan Registration ID (WSMP), or any other registration number approved by MPI, of the manufacturing premises.
- (6) Where operators print other types of premises identifiers on the labels (eg phytosanitary identifiers for vegetable packhouses), MPI recommends that these remain on the labels as well.

7.2 Changes to location, legal representative, or MPI registration number

- (1) Decree 248 Article 19 states that in the following three circumstances, the Chinese registration number will automatically become invalid, and operators would need to re-apply for GACC registration:
 - a) Relocation of manufacturing premises, or
 - b) Alteration of legal representative, or
 - c) Alteration of registration number approved by MPI.
- (2) If the registered premises address changes but the location remains unchanged, MPI understands that this would require a registration modification application to GACC rather than a re-registration application.
- (3) MPI understands that the legal representative is a person representing the registered premises who can be held responsible.

- (4) Operators need to be aware that MPI Food Act Site Registration needs to be renewed annually via the relevant registration authority. Operators are therefore cautioned to ensure this renewal is always completed in time so that the Food Act Registration Number doesn't change, as would be the case if the MPI Food Act Site Registration lapses. This would result in the operator having to re-apply for GACC registration.
- (5) MPI understands the CIFER website will have the functionality to submit registration modification and re-registration applications. For operators who need to apply for GACC registration via MPI (refer to Section 5), MPI will publish further advice regarding the application processes of registration modification and re-registration once more information is available.

7.3 Validity and renewal of registration

- (1) Article 16 states that GACC registrations of overseas manufacturers of importer food will be valid for 5 years. MPI expects the expiry date of each premises will be clear when GACC publishes the registers.
- (2) Article 20 states that manufacturers should apply to renew their GACC registration from 3-6 months before the date of expiry. This renewal should be done using the same registration method as was used for the initial registration, ie either via MPI (Article 7) or directly with GACC (Article 9).
- (3) MPI understands the CIFER website will have the functionality to submit registration renewals. For operators who need to apply for GACC registration via MPI (refer to Section 5), MPI will publish further advice regarding the process of registration renewal once more information is available.

7.4 Other

- (1) GACC has confirmed that the new registration regulation (Decree 248) does not overlap with GACC's filing requirements.

Contact for further information

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