

## Q&A implementation of Chinese Customs Decree 248 & 249

General, definitions, sites used, date of entry into force.		
1	<p>Which companies are concerned by the registration obligation?</p>	<p>This obligation is specified in article 2 of the decree: it concerns companies producing, processing and storing foodstuffs exporting to China.</p> <p>Only foodstuff are concerned.</p> <p>Companies producing ingredient only need to register when those ingredients are exported to China.</p> <p>Additives are not concerned. NB: warning: additives are not defined in China in the same way as in the European Union: "<i>As it is set out in article 150 of The Food Safety Law of China, "Food additive" refers to any synthetic or natural substance added to food for improving its quality, colour, flavour, or taste or as needed by antiseptic, freshness-keeping, or processing techniques, including nutrient supplements.</i>"</p> <p>Only the producer of the <u>final</u> product is concerned; producers of intermediate products, such as ingredient suppliers, are excluded from the scope of the decree and from the registration requirement.</p> <p>An exporter who does not carry out one of these activities (production, processing or storage) is not concerned, as such.</p> <p>The GACC further clarified that:</p> <ul style="list-style-type: none"> <li>• producers not exporting directly to China do not have to register;</li> <li>• only temperature-controlled (refrigerated) warehouses need to register.</li> </ul> <p>These information (which do not appear in the decree itself) must however be interpreted according to the organization of the production and export process specific to each sector (<i>see below</i>); it is advisable to see between the actors of the sector how these provisions can be applied.</p>
2	<p>In the past, food exporters (producers and traders) had to register on the IRE site. Is this provision still valid?</p> <p>If yes, does the producer company exporting food to China have to register under CIFER as a production company, and under IRE as an exporter (double registration)?</p>	<p>Exporters must register, as an exporter, on IRE: <a href="http://ire.customs.gov.cn">http://ire.customs.gov.cn</a>.</p> <p>Companies producing foodstuffs exported to China must register as a producer on CIFER: <a href="https://cifer.singlewindow.cn">https://cifer.singlewindow.cn</a>.</p>
3	<p>Which site should be used?</p>	<p>The site for use by food companies exporting to China is <a href="https://cifer.singlewindow.cn">https://cifer.singlewindow.cn</a>.</p> <p>You should no longer use the old CIFER site <a href="http://spj.customs.gov.cn/cifer/">http://spj.customs.gov.cn/cifer/</a>; it will be abandoned.</p> <p>Companies are advised to carry out their registration themselves, without entrusting it to a third party (importer or else). However, if you would like to entrust the registration to an agent, the</p>

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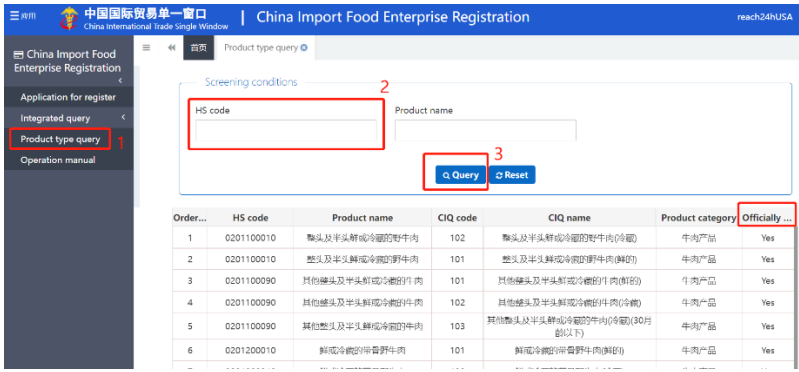
		<p>AußenwirtschaftsCenter Shanghai (E <a href="mailto:shanghai@wko.at">shanghai@wko.at</a>) can provide you reliable contacts.</p> <p><i>Phising</i> attempts are circulating on the net, offering companies the opportunity to register for a fee. These scam attempts should not be responded to.</p>
4	How the date of entry applies effective 1 <sup>st</sup> January 2022?	<p>The GACC specified, after some hesitation, that this date of entry into force would apply as follows:</p> <ul style="list-style-type: none"> <li>1<sup>st</sup> January 2022 is the date of <b>production</b> of the final product (e.g, bottling) from which products must bear the registration number, Austrian or Chinese, on their label;</li> <li>1<sup>st</sup> January 2022 is the date at which the product is <b>shipped</b> from the exporting country (Austria or other) and from which the Chinese registration number must be used on the customs declaration upon arrival in China.</li> </ul>
5	How does the Chinese registration number look like?	The Chinese registration number will start with 'letter C', followed by '3-letter exporting country code', HS code (4 digits), 'year, month and date of registration' (6 digits) and 'sequence number' (4 digits).
6	Where do I find the Chinese registration number?	Once your registration was successful it will appear in the field below:

Order...	Application serial...	Registration num...	Application time	Product category	Application type	Application status	Customs receipt	Institutional receipt	Data location	Operation
1	OPT202100000005508	CAUT00002112140001	2021-11-15 22:31:03	Protein and its derivatives	Registration application	Enterprise temporary storage	Examine	Examine	Enterprise	Examine
2	OPT202100000005506	-	2021-11-15 22:30:34	Jellies	Registration application	Enterprise temporary storage	Examine	Examine	Enterprise	Examine
3	OPT202100000005502	-	2021-11-15 22:27:56	Strains for food processing	Registration application	Enterprise temporary storage	Examine	Examine	Enterprise	Examine
4	OPT202100000005500	-	2021-11-15 22:24:19	Brewing ingredients	Registration application	Enterprise temporary storage	Examine	Examine	Enterprise	Examine
5	OPT202100000005498	-	2021-11-15 22:23:01	Puffed food	Registration application	Enterprise temporary storage	Examine	Examine	Enterprise	Examine

7	Will I get a confirmation email once my registration was successful?	You will not receive a confirmation email. Therefore, it is advisable to review the singlewindow website on a regular basis.
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<b>Exemptions</b>		
8	Will these new rules change anything for shipping samples to China?	No. GACC replied that commercial samples (for exhibitions, for example) did not entail any registration obligation for the producer concerned.
9	Does Decree 248 apply to goods sold through electronic commerce?	No. GACC replied that goods sold through electronic commerce did not result in an obligation to register the producer concerned.
10	How about the registration of fresh fruits?	Fresh fruit exports are covered by agricultural protocols and are therefore not covered by decree 248 & 249.
11	Are products that only transit through China exempt from registration requirements?	Producer registration is not required for products in transit.
12	Do final products exported to China but not destined for the Chinese market have to have a registration number (for example, products destined for the Korean market, labelled with Korean labels and repackaged in China)?  Is a declaration required to exempt these products?	Any product entering the Chinese market must bear a Chinese or Austrian registration number on the inner and outer packaging of the product.  Manufacturers of products that do not enter the Chinese market do not need to register.
13	Can the GACC confirm that duty-free products do not fall within the scope of Decree 248?	Yes, products sold duty free do not fall within the scope of Decree 248.
14	Is registration applicable to exports to Hong Kong and Macao?  And to Hainan?	No, to Hong Kong and Macao.  Yes, to Hainan.

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Identification of the site to be registered																																																			
15	Is a producer who does not carry out the export operation concerned by this registration?	In principle, the registration of the production / processing site of the final product exported to China should be carried out.																																																	
16	How to know the corresponding food category and registration method?	<p>You can find the answer in the registration system. Click the button of "Product type query" in the left menu. Then input the HS Code of your product and click "Query". If the word "NO" appears under the "Officially Recommended Registration" column, it means enterprises need to apply for the registration by themselves or by agents.</p>  <table border="1" data-bbox="836 817 1465 981"> <thead> <tr> <th>Order...</th> <th>HS code</th> <th>Product name</th> <th>CIQ code</th> <th>CIQ name</th> <th>Product category</th> <th>Officially ...</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>0201100010</td> <td>整头及半头鲜或冷藏的犏牛肉</td> <td>102</td> <td>整头及半头鲜或冷藏的犏牛肉(冷藏)</td> <td>牛肉产品</td> <td>Yes</td> </tr> <tr> <td>2</td> <td>0201100010</td> <td>整头及半头鲜或冷藏的野牛肉</td> <td>101</td> <td>整头及半头鲜或冷藏的野牛肉(鲜的)</td> <td>牛肉产品</td> <td>Yes</td> </tr> <tr> <td>3</td> <td>0201100090</td> <td>其他整头及半头鲜或冷藏的牛肉</td> <td>101</td> <td>其他整头及半头鲜或冷藏的牛肉(鲜的)</td> <td>牛肉产品</td> <td>Yes</td> </tr> <tr> <td>4</td> <td>0201100090</td> <td>其他整头及半头鲜或冷藏的牛肉</td> <td>102</td> <td>其他整头及半头鲜或冷藏的牛肉(冷藏)</td> <td>牛肉产品</td> <td>Yes</td> </tr> <tr> <td>5</td> <td>0201100090</td> <td>其他整头及半头鲜或冷藏的牛肉</td> <td>103</td> <td>其他整头及半头鲜或冷藏的牛肉(冷藏)(30日或以上)</td> <td>牛肉产品</td> <td>Yes</td> </tr> <tr> <td>6</td> <td>0201200010</td> <td>鲜或冷藏的甲鲁野牛肉</td> <td>101</td> <td>鲜或冷藏的甲鲁野牛肉(鲜的)</td> <td>牛肉产品</td> <td>Yes</td> </tr> </tbody> </table>	Order...	HS code	Product name	CIQ code	CIQ name	Product category	Officially ...	1	0201100010	整头及半头鲜或冷藏的犏牛肉	102	整头及半头鲜或冷藏的犏牛肉(冷藏)	牛肉产品	Yes	2	0201100010	整头及半头鲜或冷藏的野牛肉	101	整头及半头鲜或冷藏的野牛肉(鲜的)	牛肉产品	Yes	3	0201100090	其他整头及半头鲜或冷藏的牛肉	101	其他整头及半头鲜或冷藏的牛肉(鲜的)	牛肉产品	Yes	4	0201100090	其他整头及半头鲜或冷藏的牛肉	102	其他整头及半头鲜或冷藏的牛肉(冷藏)	牛肉产品	Yes	5	0201100090	其他整头及半头鲜或冷藏的牛肉	103	其他整头及半头鲜或冷藏的牛肉(冷藏)(30日或以上)	牛肉产品	Yes	6	0201200010	鲜或冷藏的甲鲁野牛肉	101	鲜或冷藏的甲鲁野牛肉(鲜的)	牛肉产品	Yes
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17	How does it happen when a company structure has several production areas (which will not export directly, since it will be the structure that brings them together)? Who should apply for a CIFER number?	<p>The decree targets producing establishments and not legal structures: each production site must register.</p> <p>The decree provides that production, processing and storage activities are affected by the registration obligation (article 2). GACC also specified that only the establishment developing the final product had to register.</p> <p>There are therefore several possibilities, in such a case, the application of which depends on the circumstances:</p> <ul style="list-style-type: none"> <li>• either it can be considered that the products from the various fields are centralized, after production, in a trading structure, where they are stored before export; it is the latter structure that can be registered in CIFER not as an exporter but taking into account its warehousing activity;</li> <li>• either each domain registers independently, in particular if each one exports directly.</li> </ul>																																																	
18	We are a trading company. We do not produce ourselves, but we are the ones who export. Do we still have to register knowing that we are not producing or is it up to our suppliers to do so knowing that they themselves are not the exporters?	<p>In principle, the registration of the production site of the final product exported to China should be carried out.</p> <p>There may be situations where this registration of the production site is difficult; the application can then vary according to the organization of the export in the sector:</p> <ul style="list-style-type: none"> <li>• if producers export directly, they must register and use their registration number, Austrian or Chinese, to label their products;</li> <li>• if they do not export directly and if they are unaware that their products are exported, this registration is difficult if not impossible;</li> </ul>																																																	

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		It may be appropriate, in this case, to consider that the trading company represents a stage of the production process due to the warehousing, which it does before exporting; it is this structure which could then be registered for its warehousing activity.
19	We are a (wine) trading company and do not produce ourselves; we bottle the product in a bottling centre. Do we have to register? Or does the bottling centre have to do it?	A priori, the bottling centre, producer of the final product, must register. This is possible if this centre knows the destination of the products and carries out the final packaging. Otherwise, cf. answer previous questions.
20	Does Decree 248 apply to bulk food?	Yes.
21	<ul style="list-style-type: none"> <li>• <u>case n° 1</u>: We buy bulk that we package in the brand name of a property but we are not the owners ; how can we register products on CIFER that we do not own?</li> <li>• <u>case n° 2</u>: We buy in bulk and assemble and package under our brand names.</li> <li>• <u>case n° 3</u>: We buy in bulk and proceed with the assemblies but we sell them in blockage form to our customers so that they can affix their labels / brand names; How do we register wines on the CIFER platform that are pulled-out without a label when the platform asks us for photos of the finished products? Our customers affix their labels / brand names but we sometimes send them in print and we do not know the final visual.</li> </ul>	<p>Bulk bottling is considered a processing activity; it is the bottler who must register because it is he who produces the final product (eg. bottled wine).</p> <p>Bulk bottling is considered a processing activity;</p> <p>The obligation to provide photos in CIFER should be removed by GACC (but this modification has not yet been made on CIFER, as of December 15, 2021).</p> <p>This scenario poses a practical difficulty: the bottling phase can be considered as the production of the final product; labelling is not a transformation able to influence sanitary quality.</p> <p>In such a case, it is advisable to discuss the application of the decree between the operators concerned, and with their professional federation, to find the most suitable solution.</p>
22	It was said that «the operator legally responsible for the product" had to register on the portal. We are only bottling and the trader appears on the label. Who has to get registered?	<p>Operators concerned by the registration are the food production, processing and storage companies exporting to China (article 2 of the decree).</p> <p>The decree pursues an objective of sanitary traceability: it is therefore the production sites (and not the legal entity) of the final product which will be exported (bottles, in this case) that must be registered.</p>
23	What happens for a company that makes wine in bottles but without affixing a label (put by another operator, with its brand)?	It is the operator who prepares the final product (the one who conditioned and capped the bottle) who must register.
24	Which structure should apply for the CIFER number: the production establishment or the trading company that exports the goods to China and appears on all the documents (invoice, export customs declaration, DAE, etc.)	The decree pursues an objective of sanitary traceability: it is therefore the production sites (and not the legal entity) of the final product that will be exported (bottles, in this case) that must be registered.

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25	We have just taken over a wine estate, the former owners already exported to China. Should we make a record like it was the 1 <sup>st</sup> time in our name or do we take the statements of the former owners?	This regulation is new. The former owners were therefore most probably not registered; you must register if your activity falls within the scope of the decree.
<b>SPS risk plants (18 categories)</b>		
26	For the 18 SPS risk categories that must be recommended for registration by the competent authority, is the competent authority the only one to fill in the information on CIFER, or can every company fill in this information?	<p>For these products listed in article 7, after the allocation of the account number of the registration system by the health authorities of the exporting country (Austria).</p> <p>From the information available, the authorities are supposed to create a password and an identifier and communicate these to the company concerned; the latter can then access the platform and must submit its registration request, in accordance with the process by CIFER.</p> <p>The respective role of the company and the health authorities remains to be specified by the GACC. The details of the procedure are not known at this stage.</p>
27	Do high-risk companies that are already licensed also need to obtain to register?	No, their data is automatically taken over by the GACC in the new database; the account identifiers will be provided by the competent Austrian health authority, when it has received it from GACC.
28	<p>How will a high risk product company (18 categories listed in article 8) access their account?</p> <p>And manage it?</p>	<p>GACC is supposed to provide the Austrian authority (like other countries) with the list of registered companies:</p> <ul style="list-style-type: none"> <li>• either because they were already exporting one of the 4 products considered as SPS (and were already registered);</li> <li>• or because Austria requested their registration on the Excel list sent to the GACC on October 31, as historical exporters.</li> </ul> <p>As of December 23, the Austrian competent authority had not received this information.</p> <p>The information will be communicated to the companies concerned as soon as GACC has provided them.</p> <p>The procedure for subsequent management of the accounts, in particular the role of the Austrian health authority, has not been specified by GACC at this stage.</p>
29	What is the situation of a production site manufacturing high-risk products (subject to the registration procedure via the authorities) and low-risk products (subject to self-registration)?	<p>A company (production site) should only have one account:</p> <ul style="list-style-type: none"> <li>• as a first step, the Austrian authorities will generate an account for the company and share the log-in details with them. In this account they can register products of the 4+14 categories and beyond.</li> <li>• Once the data for the 4+14 categories was submitted, the competent authority will review and approve it, before forwarding the application to GACC:</li> </ul>

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		<p>The specific procedure for doing so has not yet been specified by GACC. In the future, it might be also possible for the companies to start the registration process for the high-risk products themselves, before asking the competent authority for creating the account, but this has not been confirmed nor implemented yet.</p> <p>Given the short time, GACC also mentioned that companies falling under both registration schemes and waiting to get their account confirmed (submission by Excel list end of October) can go ahead with the self-registration they just need to make sure to use the same "Located Country(Region) Register Number" as it was submitted through the competent authority, which was in most cases the Austrian tax ID (UID-Nummer). Because GACC plans to merge the accounts for self-registration and registration through the competent authority in the future and therefore, the local registration number needs to be compliant.</p>
30	Who is the competent authority in Austria for the registration of the 4+14 food categories?	<p>In Austria the ministry of social affairs, health, care and consumer protection is responsible for the registration of the high-risk food categories. (Bundesministerium für Soziales, Gesundheit, Pflege u. Konsumentenschutz – BMSGPK)</p>
<p><b>Market opening procedure</b></p>		
31	We would like to confirm that the current market opening agreements will remain in effect. For example, if a country has an oats agreement (which falls into one of the 14 new categories), do these manufacturers have to register in CIFER by November 30?	<p>Registered businesses do not need to register again. If the information and inspection data of previously registered companies are incomplete, authorities of the exporting country should help complete the information on CIFER by June 30<sup>th</sup>, 2023.</p> <p>In the future, according to information from GACC, the competent authorities should be able to use the official account assigned by the GACC to request the addition, modification or cancellation of companies through CIFER. Modalities of this management are unknown at this stage.</p>
32	How does the registration process affect the market access process? Is the registration of producers an additional step after the market access process?	<p>GACC implements the market access procedure for SPS risk products (18 categories). This includes acceptance of the application, organization assessment, consultation on inspection and quarantine requirements, company registration, importer filing and licensing quarantine.</p> <p>The registration of the producer company is therefore only an – advanced – stage of market access, on the recommendation of the competent authority, after its opening has been obtained by the exporting country.</p> <p>The new regulation does not therefore appear to modify (i.e. simplify) the existing market access procedure.</p>
33	What happens for a new application from a company producing food classified in	The request follows the procedure provided for in Article 8

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	one of the 18 categories and whose access to the Chinese market is already open?	<p>The company must submit its application file in CIFER; it will be submitted to the Chinese authorities after having been examined by the health authority of the exporting country.</p> <p>If there is no significant change in the health management system of the exporting country, it is not necessary for the GACC to reassess it; the market remains open.</p>
<p><b>Company registration, product declaration, optional information</b></p>		
34	Can a producer not yet exporting to China register and obtain a registration number (for example, in case the capacity of its other exporting factories is suddenly insufficient)?	These production sites can submit a registration request through CIFER.
35	If we have warehouses with more than one supplier, do we have to register with all of them?	According to the GACC, only temperature-controlled warehouses are required to register. Depending on the nature of these warehouses and the operator carrying out the export, it should be considered whether it is appropriate for these warehouses to register.
36	If all the products produced in the same factory have the same registration number, and if new products are to be exported to China from this registered factory, is it necessary to update the registration information on CIFER?	<p>When applying for registration, the company must indicate the products exported to China and their HS code.</p> <p>If other products are to be exported to China, the company must proceed to add the corresponding products and their HS codes via CIFER.</p>
37	<p>On the declaration site, we are asked to specify the products we want to export to China, will we have to register the names of the product, or we could add as we go?</p> <p>Do you know if the recording can be changed once done?</p>	<p>Once the application file has been saved, it is not possible anymore to modify it until you have obtained the response from the GACC.</p> <p>It is therefore necessary to record all necessary information before saving and sending the request to the GACC.</p> <p>Beyond that, the methods of account management by the company, and in particular the ease for the latter to modify the information, are not known. It is not certain that the use is flexible.</p>
38	For wine, will a registration be required at each change of vintage?	<p>No, since the HS code and the product remain the same.</p> <p>The question of the photo poses a difficulty; GACC has taken a shifting stance on the mandatory nature of photos; its last position is that photos are not mandatory.</p> <p>According to GACC, providing photos of the products is useful to know if the classification, which the company chose for their products is correct.</p>
39	Is the provision of information in CIFER on the percentage of ingredients and their sources mandatory or optional?	The provision of items by producers of low risk commodities, such as raw materials, ingredients, source country and percentage of product composition, is optional. It is not advised to provide them, given their frequent complexity, the lack of visibility on the procedure and the uncertainty as to their use.

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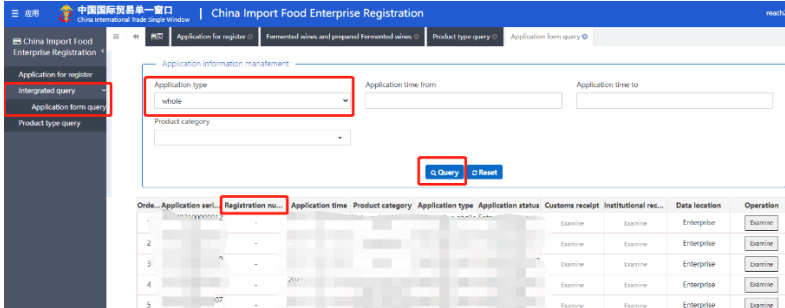


40	Will indicating the percentage of ingredients and the production process on CIFER make customs clearance faster? Will it still be necessary to provide these documents each time products are imported into China?	According to GACC, the percentage of ingredients and the production process are not disclosed on CIFER.
41	If the exporter does not fill in the optional information, will he not be penalized by Chinese customs?	No, since these are optional information. However, it is not impossible that they become mandatory at a later stage.
42	Can non-Austrian production sites be registered under an Austrian registration number?	No, the production site must follow the instructions of the competent authority of the country where it is located. This production site cannot receive a registration number from another country.
43	Is there a cross-checking of information between the issued invoice and its title / original document and the structure that requested the CIFER number?	This point was not discussed but such cross-checking is possible, even likely, during tax and customs checks by the Chinese authorities. These controls tend to increase over the years. The best consistency should be sought.
44	6-digit or 8-digit HS code?	The six-digit HS code is internationally harmonized; beyond that, it is specific to each economic zone (European Union, China, etc.). A six-digit code should be preferred to avoid errors, due to the specificities of the Chinese customs nomenclature. Moreover, it is advisable to check with the importer, which HS Code & CIQ code is used for import customs in China. It is up to the producer, possibly with the help of his forwarder / customs declarant, to ensure the appropriate classification of his goods in the Chinese nomenclature. The list of HS codes and the applicable procedure (article 8, 9 or out of scope) can be consulted, after creation of a Singlewindow account, at the following address: <a href="https://cifer.singlewindow.cn/deskserver/sw/deskIndex? menu_id = cifer001">https://cifer.singlewindow.cn/deskserver/sw/deskIndex? menu_id = cifer001</a> . This classification goes up to 10 digits. This is the most relevant information. This site (in Chinese) presents information updated by the GACC.
45	I am trying to identify under which product categories on the platform my product should be registered. I can't find the HS code in the GACC list.	There are two possible reasons for this: <ul style="list-style-type: none"> <li>the company has encoded an HS code not included in the Chinese classification; the 10-digit HS codes used on the platform are Chinese HS codes. Therefore, it is preferable to use the six-digit HS code which is harmonized internationally.</li> <li>if the six-digit HS code does not return any results, it is because the product is not concerned by decree 248. In this case, the product does not have to be declared; and if all the products of a company are not to be declared, the company itself does not have to register.</li> </ul>
46	What happens if we change the name of our company? Do we have to re-register our products?	When changing production site, legal representative, registration number of the exporting country or company name, the producer must submit a new registration request (article 19 of decree 248).

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	If so, will the old registration number be deleted automatically?	The previous Chinese registration number will automatically become invalid. However, upon arrival in China, GACC will have a history of registration numbers and allow a transition period; the duration of this has not been specified by the GACC.
47	We produce pralines. Do we have to register each praline separately since they have different tastes and appearances?	No. The product should be registered up to the mark; it is not necessary to register every variant (e.g strawberry flavour, sugar free version, etc.).  GACC confirmed that if the 10-digit HS code and the CIQ code are the same, it is enough to register only one product. If the HS code or CIQ code are differing, each product has to be registered.
48	What do we mean by " <i>product brand</i> "? The brand of the product or the name of the product?	This is the brand of the product. It is not the name of the product. For example, ABC brand XYZ beer. It is therefore advisable to encode only "ABC", and not "ABC XYZ".
49	What should I use as "Located Country(Region) Register Number"?	As local "Austrian" registration number, a business number, company register number, tax number or other unique number that's related to the company can be used. The Austrian competent authority has used the tax ID for the companies that have to be nominated for registration, because it starts with AT ... and therefore, is easily associated with Austria. We therefore recommend using the Austrian tax ID (UID Nummer).
50	Which document should I upload to " <i>Licensed production certificate issued by the competent authority of the country (region)</i> "?	We would suggest the Austrian company register (Firmenbuchauszug).
51	If I am exporting wine – in the category: " <i>Products to be registered / added to China</i> " do I have to fill all our vintages?	GACC confirmed that if the 10-digit HS code and the CIQ code are the same, it is enough to register only one product. If the HS code or CIQ code are differing, each product has to be registered.
52	" <i>Please download the enterprise declaration , and sign as required, upload scanned copy</i> " What declaration is this?	This declaration is the one provided for in article 9 of the decree (§ 3): by this declaration, the producer undertakes to comply with Chinese regulations, and in particular decree 248; the violation of these obligations is punishable by sanctions.
53	Who has to sign the company declaration? The owner, CEO or director of the site?	A person legally responsible for the management of the site, having the authority to affirm that the documents provided are authentic.  Insofar as the change of this person in charge entails the obligation to re-do a self-declaration (article 19 of decree 248), it is advisable to choose the person who has the least chance of changing and losing this legal responsibility.
54	The following information is requested: " <i>Designed annual production and processing capacity (tons / year) and Actual production and processing capacity (tons / year)</i> "  Is this data by product / reference or by plant? Indeed, a production line can be used for several references, the	The question concerns the box " <i>Product to be exported to China, HS code, Brand, Number of storage warehouse, Storage capacity, Annual designed productivity, Actual annual production / processing capacity, Operation</i> ".  This information relates to each product to be provided: <ul style="list-style-type: none"> <li>• annual production can be resumed from previous years (adapted, in the event of investments);</li> </ul>

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	production capacity of a reference does not really make sense.	<ul style="list-style-type: none"> <li>the planned production can be declared;</li> <li>for capacity, the answer is uncertain; at a minimum, care should be taken that the addition of the production capacity indicated for each product does not exceed the total production capacity of the equipment.</li> </ul>
55	What if my raw materials come from different countries?	The information to be provided for raw materials / ingredients is optional. It is recommended not to provide information which is not mandatory, in the absence of sufficient visibility on this procedure, and therefore, not to fill in this field.
56	On the GACC website, there is mentioned a "model form" containing examples and demonstrations of various food production companies; however, this form does not seem to exist.	GACC is considering providing examples to complete the registration application.
57	Does the GACC have a <i>hotline</i> system?	<p>If you have any questions, GACC recommends contacting its <i>hotline</i>:</p> <ul style="list-style-type: none"> <li>emails: <a href="mailto:shipinjujichu@customs.gov.cn">shipinjujichu@customs.gov.cn</a> - <a href="mailto:division_registration@customs.gov.cn">division_registration@customs.gov.cn</a>;</li> <li>Phone: + 86 159 0027 0722 / + 86 10 6519 4443 / +86 10 8647 2006</li> <li>Hotline: +86 12360</li> </ul> <p>A Chinese speaker is required for this contact.</p> <p>Active at the start, this <i>hotline</i> now seems less responsive.</p>
58	If everything is completed correctly, after how long is our application validated and we receive our Chinese registration number?	<p>According to initial observations, the validation of the application and the allocation of a Chinese registration number takes between four days and three weeks.</p> <p>Due to the evolving nature of the system and the fact that a very large number of companies must, undoubtedly, still proceed to their self-declaration, this period is likely to change, in particular to lengthen.</p>
59	We have got the registration number of the category "biscuit". What should we do if we want to add more products under this category in the future?	<p>Currently already approved registrations cannot be modified.</p> <p>But GACC mentioned recently that the function "change application" will be implemented soon and then further products can be added to the same category.</p>
60	We have submitted the application in the system, but we cannot confirm if it is approved/accepted.	<p>You can check the status in the registration system. Click "Integrated query" in the left menu and then "application form query". Choose the application type (e.g. registration application) and click "query". If the application is approved, registration number will be shown below.</p> 

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<b>Labelling</b>		
61	Must the lot number be indicated on the packaging?	<p>According to Chinese pre-packaged food labelling rules, the indication of the batch number of the product is not mandatory.</p> <p>However, the production batch number of meat products must be indicated on the packaging.</p>
62	On the label and packaging, must the registration number be preceded by a specific mention in English and / or Chinese?	<p>Apart from the mention of the registration number itself, the labelling rules remain unchanged. Article 15 of Decree N° 248 as well as article 30 of Decree N° 249 do not specify the mention of any other information to be affixed.</p> <p>However, if the “Austrian” registration number is used on the labels, GACC recommended marking it, for example as “registration number”, in order to facilitate import customs clearance.</p>
63	Will the registration number have to appear on the original bottle label? Or can we affix this mention on the bottles using a <i>sticker</i> ?	<p>Affixing the registration number using a <i>sticker</i> remains authorized, at least as long as Chinese labelling regulation is not changed.</p> <p>Please note that there are specific requirements for health food and special dietary food (see Decree 249 – Art. 30):</p> <p><i>The labels in Chinese of import health food and special dietary food must be printed on the smallest sales package and shall not be labeled.</i></p>
64	Can the registration number be affixed by our importers in bonded <i>warehouses</i> in China as it is not currently found on product labels and packaging?	<p>The affixing of the registration number using a sticker in bonded warehouses remains authorized, at least as long as Chinese labelling regulations are not changed.</p> <p>Please note that there are specific requirements for health food and special dietary food (see Decree 249 – Art. 30).</p>
65	Does each production site have to register under a separate registration number?	<p>Yes, each production site must register under a unique identifier in the country where it is located. A production site may have several identifiers (company register number, VAT number, etc.); however, different production sites cannot have the same registration number.</p>
66	On which documents should the Chinese registration number be mentioned? Do we have to mention it on the health certificates?	<p>The Chinese registration number should be filled in the import customs declaration form for food exported to China from 1<sup>st</sup> January 2022, when import demand.</p> <p>This obligation will be verified by GACC in the customs import declaration system, depending on the date of departure of the food exported to China.</p> <p>Nothing changes regarding health certificates.</p>
67	Do we have to submit all different packaging sizes (e.g bottle size) of the same brand?	<p>No, it is not necessary.</p>
68	Concerning the wine, where to put the Austrian or Chinese registration number: on the label, the back label, on the box? Is there a regulatory size	<p>The labelling rules are not modified by Decree 248; some are specified in Decree 249 but it is the general labelling regulations that apply (in particular, GB 7718: <i>National Food Safety standard general rules for the labelling of pre-packaged Food</i>).</p>

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		<p>It is therefore possible to affix the registration number on the label or back label, according to the usual practice of the exporter.</p> <p>This number must be affixed on the inner packaging (the bottle or packet of cookies, for example), which should already have the back label, and on the outer packaging (depending on the case: a box or a pallet, for example) (article 15).</p>
69	<p>According to Chinese customers, the GACC number or the Austrian registration number should appear on the product invoice. Is this an obligation confirmed by the GACC?</p>	<p>No, this is not confirmed by the GACC. It was never discussed. This information should be taken with caution.</p>
70	<p>Do you have any idea of the size of the characters required for the back labels and cardboard packaging?</p>	<p>The regulations have not changed: the size of the characters must comply with the rules for developing back labels, including in terms of character size.</p>
71	<p>Decree 249 states that "Chinese labels of imported health foods and special diet foods shall be printed on the smallest sales package and shall not be labelled." For other products, the company can affix the registration number after approval.</p> <p>However, for health food and special diet food, the Chinese label must be printed and the registration number must be included on the label. If they do not get the registration number by December, it is impossible to change the label on 1<sup>st</sup> January 2021.</p>	<p>Companies can indicate on the label the registration number in their country of origin or in China.</p> <p>The registration number in their country of origin (Austria) may be preferred, in this initial phase of a system, which still needs to be clarified and stabilized.</p> <p>The Chinese registration number may be privileged later, when the system is operational.</p>
72	<p>In the case of pallets made up of lots from different producers, is it possible to affix a label mentioning the different Austrian or Chinese registration numbers?</p> <p>If this is not possible, how do you deal with non-homogeneous pallets?</p> <p>In the case of batches made up of products from different production sites, should the Chinese or Austrian registration numbers appear for each product, detailing it on each line of the invoice?</p>	<p>The GACC did not address these points.</p> <p>It seems that it is possible to affix a label mentioning the different Austrian or Chinese registration numbers, as long as the products on the pallet are clearly marked.</p>
73	<p>How about products shipped in November/December 2021 but arrived January 2022? Will there be any grace period?</p>	<p>GACC clarified in the announcement 103 that "For imported foods which will be shipped to China on and after Jan. 1, 2022, Chinese registration number shall be submitted during the import declaration. Otherwise, GACC will reject the declaration."</p> <p>As for the food labeling, only the imported foods produced on and after Jan. 1, 2022 should label registration number on the inner and outer</p>

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		package of products. The registration number here refers to the registration number used in exporting country or the approved registration number in China. Manufacturers can mark either of the registration numbers on the package.
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