**Regulations on the Registration and Administration of Overseas Producers of Imported Food**

**(General Administration of the Customs of the P.R.C - GACC Decree 248)**

**Summary**

**Main requirement:** All overseas manufacturers of food imported in the P.R.C. shall obtain the registration approval from the General Administration of Customs of the People’s Republic of China (GACC). Lacking such registration, the food will not be allowed to be imported in China.

**Entry into force**: January 1st, 2022.

**Brief overview on the content of the Decree:**

* Currently (i.e., before the implementation of the new Decree No. 248) only the overseas manufacturers of meat product, aquatic products, dairy products (including infant formula) and edible bird’s nest had to apply for registration at GACC. The Decree No. 248 extends this requirement to all **overseas manufacturers of food which is imported in the P.R.C.**
* Depending on the different food categories, different registration requirements and method will apply.

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| **Food Category** | **Applicable Registration Method** |
| 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, grain milling industrial products and malt, fresh and dehydrated vegetables and dried beans, seasonings, nuts and seeds, dried fruits, unroasted coffee beans and cocoa beans, special dietary foods\*, health foods.  \*Currently, special dietary foods in China include infant formula foods, infant complementary foods, foods for special medical purpose (FSMP), nutrition supplementary foods, sports nutrition foods, nutrition supplementary food for pregnant women and wet nurse. | Recommendation by the competent national authority of the Exporting Country (in Italy, we assume it will be *Ministero della Salute* in line with the current policy as for meat and dairy products) |
| Food categories other than those mentioned above. | Application by the manufacturer himself or his entrusted agent |

* Where the Applicable Registration Method is the “Recommendation by the competent national authority of the Exporting Country”, the following materials shall be submitted (1) letter of recommendation by the competent national authority of the Exporting Contry; (2) list of (recommended) producers and the producers’ application for registration; (3) Documents certifying identification of the producer, such as the business license issued by the competent authority of the exporting country (for Italy, the *visura camerale)*; (4) Statement that the producer recommended by the competent authority of the exporting Country conform with requirements of the Decree No. 248; (5) Reports of examinations/inspections/review conducted by the competent authority of the Exporting Country to relevant producers.
* Where the Applicable Registration Method is the “Application by the manufacturer himself or his entrusted agent”, the procedure will be easier and mainly based on self-declarations. In more details, the documents to be provided will be (1) Producer’s application for facility registration; (2) Documents certifying the identification of the facility, such as business license (in Italy, the *visura camerale*) issued by the competent authority of the Exporting Country.
* At present, the detailed requirements of the materials have not been clear yet, while it is speculated that, GACC would issue corresponding supplementary documents or update the online system of China Import Food Enterprise Registration in accordance with the requirements of the New Regulation in the near future, so as to help the applicant understand the specific material requirements.
* The registration of the overseas food manufacturer will be valid for **five years**.
* GACC will publish the list of (authorized) overseas producers of foods imported in the P.R.C.