



## Food and beverages technical requirements and labelling



### Overview of import requirements for pre-packaged food and beverages

Pre-packaged food and beverage products exported to China need to obtain a sanitary certificate and comply with labelling requirements among others. All imported food and beverages are subject to inspection by the China Entry-Exit Inspection and Quarantine Bureau (CIQ).

Chinese import procedures can be lengthy and complicated for the first shipment, but once shipments become more regular and local CIQ officials are familiar with the product, the process should be relatively straightforward. Unexpected disruptions to usual procedure are nevertheless frequent. Employing a trusted local agent to navigate these inconsistencies is highly recommended. It is also wise to have a company representative on hand throughout each stage of the process.

Before importing, EU SMEs must register at the Chinese Ministry of Commerce (MOFCOM) and are well advised to check with the Chinese Certification and Accreditation Administration (CNCA) if their products also require producer registration. To clear customs, an EU SME's first shipment of pre-packaged goods will need to:

- acquire a CIQ certificate of import food labelling verification for the product's Chinese label;
- meet declaration requirements at customs;
- acquire a CIQ sanitary certificate.

**The following documentation is required:**

- documentation to demonstrate permission to manufacture and sell in the country or region of origin;
- documentation to support the label verification application;
- shipment declaration papers.

The documentation should be submitted to the local CIQ port prior to the goods' arrival. The product's Chinese label must be registered and verified for use. This can be done before shipment or after goods arrive in China. In practice it saves time to complete this procedure ahead of shipping. After the goods arrive importers pay tax at customs. The goods are submitted to CIQ where three to five packages or four to six bottles are selected for sampling and inspection. A CIQ sanitary certificate is issued.

All pre-packaged food and beverages proceed through a similar process. Labelling requirements differ slightly for pre-packaged food, beverages and foods for special dietary uses. SMEs can expect pre-packaged health foods to spend longer in CIQ inspection than other ordinary food and beverage products. Wine is often sampled more generously than pre-packaged food products.

Since the adoption of China's new Food Safety Law in 2009, all imported food products, food additives and food-related products are subject to national food safety standards. All producers and distributors of imported food products are required to register with the entry-exit inspection and quarantine authorities. Importers are required to record foods imported and distributed in China and must keep records for at least two years.

### Technical requirements for pre-packaged food and beverage products imported into China

#### **Standards for imported food and beverages**

New Chinese standards for the inspection of imported food and food additives were jointly announced by AQSIQ and the Ministry of Health on 22<sup>nd</sup> July 2009. Accompanying the announcement were schedules for standards for imported food, food additives and flavourings. Translations of these schedules prepared by the US Department of Agriculture can be downloaded at:

- Directory of imported food and related standards (20<sup>th</sup> Apr 2009)  
<http://www.usdachina.org/uploadFiles/Announcement%20No%5B1%5D.72-Attachment%201.xls>
- Directory of food additives allowed for use in the P.R.C. and related standards (18<sup>th</sup> Apr 2009)  
<http://www.usdachina.org/uploadFiles/Announcement%20No%5B1%5D.72-Attachment%202.xls>
- Directory of flavourings allowed for use in the P.R.C. and related standards (17<sup>th</sup> Dec 1996)  
<http://www.usdachina.org/uploadFiles/Announcement%20No%5B1%5D.72-Attachment%203.xls>

The rules took effect from the day they were released. As professional standards are replaced by new national GB standards (see below) they will be incorporated into the three schedules above.

The Ministry of Health (MoH) announced on 13<sup>th</sup> July 2010 that a new set of food safety standards would be created. During this process existing standards would be reviewed and updated, including the general standard for the labelling of pre-packaged foods, standards for food additives, and so forth.<sup>1</sup> The most recent update for national food safety standards was on 18 March 2011, when the MoH released a directory of 58 food additives and the corresponding standards.<sup>2</sup>

Updates on food standards are available in Chinese here:  
[http://www.standardcn.com/article/class\\_gg.asp?id=37&page=](http://www.standardcn.com/article/class_gg.asp?id=37&page=)  
or here: <http://www.safefood.gov.cn/Info/GetTOPNorm.html>

<sup>1</sup> <http://www.safefood.gov.cn/Info/n2337.html>

<sup>2</sup> <http://www.standardcn.com/article/show.asp?id=38588>

## Chinese national standards (GB) and professional standards

**Chinese national standards** (GB standards) are formulated for technical requirements that need uniform nationwide application. GB standards take the form of a standard code followed by the year of issue. The Standardisation Administration of China (SAC) provides a [national standards enquiry service](#) searchable by standard number, title, ICS code, etc.

To learn more about Chinese GB standards please visit our [standardisation section](#)

An incomplete bilingual list of GB food standards is available at:

<http://www.msckobe.com/links/food/gb.htm>

If national standards do not exist, and technical requirements for a certain industry need to be unified, then **professional standards**, often referred to as industry standards, can be formulated. These are to be formulated by competent administrative authorities under the State Council and reported for record keeping to the department of standardisation administration under the State Council. They should be annulled on publication of the national standards.

Users are able to enquire about applicable professional standards through the SAC professional standards enquiry service searchable only in Chinese:

<http://www.sac.gov.cn/SACSearch/outlinetemplate/hbSearch.jsp>

The majority of standards mentioned in the three schedules relevant to imported food and food additives are GB standards. A small number of professional standards are also involved.

## List of relevant organisations maintaining professional standards

Organisation that maintains professional standards	Profession/industry code	Profession/industry
MOFCOM	SB (Shangye biao zhun) SB/T (SB recommended)	Domestic trade
AQSIQ	SN SN/T	Entry and exit inspection and quarantine
State Administration of Grain	LS (Liangshi)	Grain
Ministry of Agriculture	NY (Nongye)	Agriculture
Ministry of Industry and Information Technology	QB (Qingong biao zhun) QB/T	Light industry
Ministry of Industry and Information Technology	HG (Huagong)	Chemical industry
Ministry of Industry and Information Technology	BB (Baozhuang biao zhun)	Packaging

## Comparison with international standards

Since the introduction of the new Food Safety Law in 2009, China has been rapidly updating food standards to comply with the new law. In the past, food standards could be issued by multiple organisations often resulting in overlapping, duplication and omission. Food standards must now be approved by a single authority. Chinese agencies report that currently 70% of food standards comply with international maximum residue levels (MRLs) for contaminants.

However incidences of inconsistency between local and international standards do occur. For example Liaoning CIQ reported that domestic and international standards for sugar content are quite different.

As a result, wines can be improperly classified as dry wine instead of semi-dry wines based on their sugar content.

## Import procedures

The table below provides a detailed introduction to the steps required to import pre-packaged food and beverages into China. This information is as accurate as possible as at beginning of May 2011. However it may not be complete. Procedures and timeframes change frequently and may also vary depending on local regulations and specific goods.

### Import procedures for pre-packaged food not subject to exemptions

No.	Responsible government agency	Procedure	Estimated time to complete/notify	Application form/certificate	Related regulations (See Annex 1 for details of regulations and weblinks)
1	Certification and Accreditation Administration of China (CNCA)	Obtain <b>foreign exporter producer registration</b> . Currently only producers exporting certain products subject to SPS protocols are required to register at CNCA. However, CNCA is expanding the scope of food and beverages that require registration. Producers are advised to consult CNCA when planning to export new food products to China.	CNCA unable to estimate time, because country of origin site inspections may be required.		Administrative measures for registration of enterprises producing import food (Ref 2)  Registration procedures for enterprises Producing import food (Ref 1)
2	Ministry of Commerce (MOFCOM) local agency	To qualify to import goods, importers complete a <b>foreign trade operator registration form</b> . Since 1 July 2004 this has replaced the certificate of approval for enterprises with foreign trade rights in the PRC. However, certificates issued before that date are still acceptable.	3-5 working days	Foreign trade operator registration form (See Annex 2) Certificate of approval for enterprises with foreign trade rights in the P.R.C. (See annex 3)	Procedures for registration of foreign trade operators (Ref 3)
3	MOFCOM local agency	Importers can apply for an <b>automatic import licence</b> if the product is included in the 2011 goods catalogue for automatic import licence management. Most goods are included in this list and application in most cases is straightforward. However, there are some exceptions. Before signing a contract with an overseas producer, importers are advised to consult with local government agencies, such as the Shanghai Municipal Commission of Commerce, to clarify if the product requires a licence.  An automatic import licence is not necessary for goods not included in the catalogue, such as wine.	10 working days	Automatic import licence application form. Available from the Beijing Municipal Commission of Commerce at: <a href="http://www.bjmbc.gov.cn/download/ad/1091021044.doc">www.bjmbc.gov.cn/download/ad/1091021044.doc</a> (See Annex 4).	Measures on the administration of automatic import licence of goods (Ref 7)  2011 catalogue of goods falling under the automatic import licence administration (Ref 4)



		inspection and quarantine body during the verification process. <ul style="list-style-type: none"> <li>a version of all documents in a foreign language must be provided in Chinese, and stamped with the applicant's official seal.</li> </ul>			General standard for the labelling of pre-packaged foods GB 7718—2004 (Ref 37)
5	CIQ	<b>Consignee filing</b>	5 working days	Registration form for consignee of imported food (see Annex 6) , available from Shenzhen CIQ at <a href="http://www.szciq.gov.cn/n001/ShowArticle.aspx?id=181109">http://www.szciq.gov.cn/n001/ShowArticle.aspx?id=181109</a> A record code will be issued to the consignee by CIQ. Without the code is a prerequisite to apply for sample inspection. Otherwise the applications are not accepted.	Instructions on the administration of import food consignee filing (Ref 5)
6	CIQ local or discharging port	<b>Label verification</b> If approved, a certificate of import food labelling verification is issued. The certificate is valid for two years. If not approved, applicants are notified of the reasons for the decision in writing. Application is best done ahead of shipment, rather than after products arrive in China.	If the documents are fully prepared beforehand, it usually takes 10-15 working days to verify and file the label. The labelling process usually takes 4-7 days	Certificate of import food labelling verification (See Annex 7)	Labelling regulations for imported and exported foods (Ref 35)  General standard for the labelling of pre-packaged foods for special dietary uses GB13432-2004 (Ref 36)  General standard for the labelling of pre-packaged alcoholic beverages GB10344-2005 (Ref 38)  General standard for the labelling of pre-packaged foods GB 7718—2004
7	CIQ local or discharging port	<b>Sample inspection application</b> Usually submitted after the shipment arrives, but can be submitted in advance for example at the Shenzhen port.	2-3 working days	Application form for inspection certificate of imported commodities (See Annex 8)	Regulations governing entry-exit inspection and quarantine (Ref 12)  Import and export commodity inspection law of the People's Republic of China directory of industry standards for entry-exit inspection and quarantine (Ref 8)  Regulations for the implementation of the import and export commodity inspection law of the

					<p>People's Republic of China (Ref 9)</p> <p>Directory of industry standards for entry-exit inspection and quarantine (Ref 11)</p> <p>188 industry standards for entry-exit inspection and quarantine (Ref 32)</p> <p>General administration of customs decree No. 17, 2010 (on matters related to the regulation of wine imports) (Ref 42)</p>
8	Customs Bureau	<p><b>Goods declaration</b> Price verification Customs Clearance FAQs are available at: <a href="http://www.customs.gov.cn/Default.aspx?Tabid=2556">http://www.customs.gov.cn/Default.aspx?Tabid=2556</a></p>	3 working days	P.R.C. customs entry declaration form (See Annex 9)	
9	Customs Bureau	<p><b>Duties assessment</b> Duties payment and customs clearance. Customs Clearance FAQs are available at: <a href="http://www.customs.gov.cn/Default.aspx?Tabid=2556">http://www.customs.gov.cn/Default.aspx?Tabid=2556</a></p>	2 working days		
10	CIQ	<p><b>Sample inspection</b> Samples are chosen subject to CIQ official discretion. In the case of wine, for example, SMEs can expect, on average, 2000cl (4-6 bottles) or 3-5 packages of each product to be sampled. Goods are stored in CIQ warehouses for the inspection period. sanitary certificate is issued.</p>	<p>3-5 working days at city-level CIQ. If a city-level CIQ does not have appropriate inspection equipment, inspection transferred to the provincial CIQ. This process then takes 15 working days. For health food, central AQSIC is responsible for inspection.</p>	CIQ sanitary certificate (See Annex 10)	<p>Import and export commodity inspection law of the People's Republic of China Directory of industry standards for entry-exit inspection and quarantine (Ref 8)</p> <p>Regulations for the implementation of the import and export commodity inspection law of the People's Republic of China (Ref 9)</p> <p>188 industry standards for entry-exit inspection and quarantine (Ref 32)</p> <p>General administration of customs decree No. 17, 2010 (on matters related to the regulation of wine imports) (Ref 42)</p> <p>General standard for health (functional) foods (Ref 39)</p>

					<p>General standard for wines (Ref 30)</p> <p>Announcement on the standards for the inspection of imported food and food additives (Ref 18)</p> <p>Administrative regulations on the licensing of imported food not falling under existing National food safety standards (Ref 6)</p>
11	CIQ	The importer or agent attaches Chinese labels onto the goods in the warehouse. Labels checked by CIQ.			Labelling regulations for imported and exported foods (Ref 35)
12		Goods released to distributor			

## Exemptions from import procedures

Exemptions from food import procedures are allowed for food for the diplomatic community (embassies and duty-free stores), food for use at exhibitions and fairs, and sample food. Small quantities of food stuffs imported for trial sales are not exempted and must go through normal inspection and certification procedures.

The importer, distributor or agent should take the exemption from Chinese labeling procedures (Certificate of Exemption of label 标签豁免证明) to the appropriate local food inspection agency before the goods arrive.

## Labelling

CIQ requirements often change. Exporters are advised to re-confirm requirements for labelling and other product certifications prior to dispatch of goods for export.

While similar measures are employed by other importing countries, the way in which China applies import regulations can adversely affect trade due to compliance difficulties and increased costs. China's requirements are generally greater than those of other countries.

The new Chinese standard concerning labelling requirements for agricultural commodities (i.e. foodstuffs) such as ingredient listing, labelling of gift boxes, production year etc. presents many problems for those wishing to export to the Chinese market. The case of distilled spirits in the wine and spirits sector illustrates this point. In China, distilled spirits are required to have product labels that include a bottling date. However, usual international practise does not require the date of manufacture as many spirits consist of a blend of years that are aged for varying periods, rendering the identification of a single date of manufacture impossible. China also maintains typeface and translation specifications that are inconsistent with international standards. Even when companies are able to comply with such strict labelling standards, compliance leads to further costs.

Local importers report that once this process has been navigated the first time, subsequent shipments are not difficult. Then the chief challenge is making sure that the correct label is applied to the correct bottle, and that the Chinese label is placed over the label of origin.

### **Label requirements: pre-packaged food (GB7718-2004)**

Label approval applications are submitted in advance of the first shipment of goods, and determined in conjunction with the first sampling and inspection process.

The label should state, *inter alia*,

- name and trade mark of the product
- type of food
- the manufacturer's name and address
- country of origin
- ingredients in descending order by weight or volume
- net weight and volume
- date of manufacture
- best before or expiry date
- usage instructions
- batch number
- relevant standard code

#### **Label requirements: food for special dietary uses (GB13432-2004)**

All imported pre-packaged foods for special dietary uses must be labelled in both English and Chinese (simplified Chinese as used in mainland China) with the **General Standard for the Labelling of Pre-packaged Foods for Special Dietary Uses (GB13432-2004)**, the following is the minimum information to be listed:

- Food name
- List of ingredients and exact volume of each ingredient
- Nutrient
- Net of weight and volume
- Name and address of manufacture and local agent or distributor
- Production date, use by date and guidance for storing
- Edible method, recommended nutrient intake, and targeted people
- Code of national standard, or industrial standard, or enterprise standard for the product
- Quality grade

The labelling of pre-packaged food for special dietary uses must follow Section 4 of GB13432-2004. The Following labelling information is prohibited:

- Any claims as to prevention, alleviation, treatment or cure of a disease.
- Claims like 'rejuvenating function', 'promising longevity', restoring white hair to dark', 'preventing and curing cancer' or their equivalents
- The use of a drug's name immediately before or after the name of a food, or the use of an image and the name of a drug implying the treatment and functional effects of such food (This does not apply to a substance which can be used both as a drug and food).

#### **Label requirements: pre-packaged alcoholic beverages (GB10344-2005)**

Imported pre-packaged alcoholic beverages must be labelled in both English and Chinese (simplified Chinese as used in mainland China) following the General Standard for the Labelling of Pre-packaged Alcoholic Beverages (GB10344-2005).

The General Standard for Beverages (GB 10789-2007) and the General Standard for the Labelling of Pre-packaged Foods (GB 7718-2004) are used by CIQ for the label verification of non-alcoholic beverages.

The following is an example of the minimum information needed. Other information may be required depending on the specific product and it is advised that exporters check with specialist logistical companies or relevant departments prior to exporting products to China:

- Wine name and type (e.g. dry red, semi-dry)
- Vintage year
- Grape variety
- Country and wine region
- List of ingredients (including raw ingredient and juice volume and any additives)
- Alcoholic strength
- Name and address of manufacture and local agent or distributor
- Production date, (or bottling date: YYYY.MM.DD), shelf life and guidance for storing
- Net weight and volume
- Code of national standard, or industrial standard, or enterprise standard for the product
- Quality grade
- Production licence
- Warning

Note: Wine and alcoholic beverages over 10 per cent alcohol volume are not required to list the date of minimum durability (use by date/expiry date) on the label.

### **Label requirements: pre-packaged non-alcoholic beverages (GB 10789-2007)**

There is no separate standard for labelling non-alcoholic beverages. The General Standard for Beverages (GB 10789-2007) is used to categorise beverages but importers can refer to the General Standard for the Labelling of Pre-packaged Foods (GB 7718-2004) for labelling.

### **Time frame and costs**

#### **Overall time for import procedures**

One of the chief difficulties faced by food and beverage exporters to China is the difficulty in estimating timeframes and costs. These can vary markedly from shipment to shipment. Customs officials, agents and local importers estimate that it takes thirty to forty days for a shipment of goods to clear customs, and CIQ inspection and labelling verification at the major ports (Guangzhou, Shenzhen, Beijing, Tianjin and Shanghai). Unpredictable delays can lengthen this time-frame considerably. The first wine shipment of one Beijing importer spent four months in Customs and CIQ. Another more well-established Beijing wine importer found one shipment mysteriously delayed by a price verification discrepancy. That wine importer estimates that, on average, goods take about four months to travel from the supplier warehouse in Europe to their warehouse in Beijing, at which time they can be released to their distributors.

For the importation of health foods, 13 to 19 extra months are needed because an Imported Health Food Approval Certificate (see Annex 11) is required.

## Cost estimates

Costs, like time-frames, are never firm. The actual cost of an individual licence can be negligible—an automatic import licence costs just 20 CNY (exchange rate 1EUR = 9 CNY). The label verification process usually costs about 2000 CNY in Guangdong and Shanghai, but can vary at other ports. A daily charge for goods housed at Customs, uncertainty over the precise number of goods selected for sampling and inspection, and variable charges for other procedures, result in differing costs for each shipment.

Import agencies charge 2000-3000 CNY per shipment, and around 600 CNY for the design of a Chinese label.

In particular, the export of health foods to China is expensive. An application for an Imported Health Food Approval Certificate costs 160,000 to 310,000 CNY. Agencies charge around 80,000 CNY to manage the process.

Timeframes and costs sometimes appear arbitrary, but they can be reduced by familiarity with the procedures, and careful attention to meeting stated requirements.



### Contact the Centre at:

Room 910, Sunflower Tower  
37 Maizidian West Street  
Chaoyang District  
Beijing, 100125

T: +86 10 8527 5300  
F: +86 10 8527 5093

[www.eusmecentre.org.cn](http://www.eusmecentre.org.cn)  
[enquiries@eusmecentre.org.cn](mailto:enquiries@eusmecentre.org.cn)

The EU SME Centre assists European SMEs to export to China by providing a comprehensive range of free, hands-on support services including the provision of information, confidential advice, networking events and training. The Centre also acts as a platform facilitating coordination amongst Member State and European public and private sector service providers to SMEs.

The Centre's range of free services cover:

- Business Development – provision of market information, business and marketing advice
- Legal – legal information, 'ask the expert' initial consultations and practical manuals
- Standards – standards and conformity requirements when exporting to China
- HR and Training – industry and horizontal training programmes
- Access to a service providers directory and information databases
- Hot-desking – free, temporary office space in the EU SME Centre to explore local business opportunities
- Any other practical support services to EU SMEs wishing to export to or invest in China.

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