FAQ - GACC Registration

Contents

1 Version History (new and updated FAQs)

Version updates are highlighted in yellow and major changes summarised in the table below. Use Ctrl+F to search for key words or questions within the document.

Version	Changes
Version 7 (November 2023)	Removal of FAQ related to modification and renewal applications that were required in 2023 as well as those FAQ that are now no longer relevant.
Version 1 (February 2023)	Document published

Disclaimer

This FAQ is intended for use as a guideline only and should not be taken as definitive or exhaustive. The Ministry for Primary Industries (MPI) endeavours to keep this information current and accurate. However, it may be subject to change without notice. MPI will not accept liability for any loss resulting from reliance on this information.

2 General

2.1 CIFER

2.1.1 Q: What's the link to China's public site showing all GACC establishment registrations?
A: https://ciferquery.singlewindow.cn/

2.1.2 Q: What's the link to login to GACC's registration website (CIFER) - China Import Food Enterprise Registration)
A: https://cifer.singlewindow.cn/

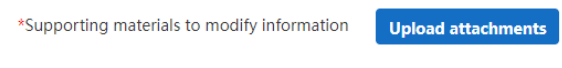
2.1.3 Q: Who should I contact if I am having issues using CIFER?
A: Guidance on using CIFER can be found here: China Imported Food Enterprise Registration (CIFER) system guidance (mpi.govt.nz). If you are still having trouble logging onto, navigating, or entering information into CIFER you can contact MPI Country Listings at CountryListings@mpi.govt.nz.

2.1.4 Q: I can't remember my CIFER username and/or password. Who should I contact?
A: Contact MPI China Country Listings (ChinaCountryListings@mpi.govt.nz), making sure you specify the relevant RMP, ULI, RCS or Food Act Registration number.

2.1.5 Q: I can't see any of my current registrations in CIFER. There is a pop-up box asking me to add an email address in CIFER. What should I do?
A: Contact MPI China Country Listings (ChinaCountryListings@mpi.govt.nz), making sure you specify the RMP, ULI, RCS or Food Act Registration number as well as the company contact email address that you would like to be added against your CIFER user account.

2.1.6 Q: CIFER won't let me upload my attachments?
A: CIFER has a file size limit of 4MB and format restrictions for documents that are uploaded. You can only upload the following file types: PDF, JPG, JPEG, PNG, GIF, BMP, so make sure you've converted any Word or Excel formats to these file types – we recommend PDF if you can. If the file you are wanting to upload is >4MB, you will have to reduce its size before uploading.

2.1.7 Q: I'm doing a modification in CIFER - what do I upload under 'supporting materials to modify information'?
A: Upload a PDF copy of your Modification Request Summary. Please ensure you capture all rows and columns with information in them when you convert this from excel format to PDF. The best way to do this is when you convert the Excel form into PDF, make sure all the Print Area has been selected so that any extra rows at the bottom do not get cut off (ie click Page Layout – Print Area – Set Print Area, then select the applicable area).

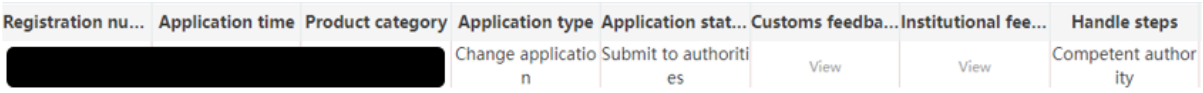


2.1.8 Q: How can I tell if I've successfully submitted my CIFER application to MPI? How can I check the status of my applications in CIFER?
A: After you submit your application, it will have red text at the top that says 'current state: Submit to authorities', and you won't be able to edit the application. This means your application is with MPI for processing in CIFER.

You can also check your application status at any time by clicking on 'Integrated query' then 'Application form query'. In the table, under the 'Application type' column for the product category you wish to check find the row that says:

- 'Registration Application' (for new)
- 'Change Application' (for modification)
- 'Continuation application' (for renewal)

Then check the 'Application Status' column of that row – if this shows as 'Submit to competent authority' (or 'submitted to competent authority'), and the 'Handle steps' shows as 'Competent authority', then you have successfully submitted your application to MPI.



Registration nu...	Application time	Product category	Application type	Application stat...	Customs feedba...	Institutional fee...	Handle steps
[redacted]			Change applicatio n	Submit to authoriti es	View	View	Competent author ity

If the 'Application status' reads 'temporarily saved by enterprise' (or similar), or the 'handle steps' show as 'enterprise', then you have not yet submitted it to MPI.

2.1.9 I have feedback on my application in CIFER, who is this from?

A: 'Customs feedback' is feedback that has been provided by GACC on your submitted application.

'Institutional feedback' is feedback that MPI has provided to you on your application, for example when MPI sends your application back to you for updating, we may insert feedback into CIFER.

2.2 China listing process

2.2.1 Q: Where can I find more information about the China listing application process?

A: For listing of establishments processing for animal products, refer to the China OMAR, Schedule 1 of Part 1. A webinar recording about the new listing process is also available here.

2.2.2 Q: Who should I contact if I have issues with my China listing application or questions on how to complete the forms?

A: If you are an operator: Contact your **verifier** in the first instance. If your verifier is unsure of the answer, they can contact the China Country Listings team ChinaCountryListings@mpi.govt.nz.

A: If you are a verifier: Contact the MPI VS Technical team in the first instance. If they are unsure of the answer, they can contact the China Country Listings team ChinaCountryListings@mpi.govt.nz

2.2.3 Q: How long does it take for MPI to review my request for recommendation (Step 3) or my CIFER submission (Step 4)?

A: Please allow 20 working days from when you submitted your application to MPI (ie either email request or CIFER application) before contacting CountryListings@mpi.govt.nz regarding the status of your application.

2.2.4 Q: How long does it take to get registered from when MPI submits my application to GACC?

A: The time it takes GACC to review and decide on whether to approve your application can vary. You can track the status of your application by going to 'Integrated Query' > 'Application Query' in CIFER.

Please note your application to GACC may not be approved straight away. Another option is that GACC may 'refuse' it, in which case they will delete your CIFER application, and you will have to start Step 4 (Application in CIFER) again. GACC may also 'return' your application for more information. Once the information required by GACC has been included/corrected, the application can be re-submitted and the approval process will continue.

2.2.5 Q: If I need to cancel my registration and then apply for new registration due to a change in physical location of my establishment, during the period in between the two actions, can exporting to China continue?

A: No. However, the period when you would be unable to make product for export to China would only be between when the cancellation application has been approved by GACC and when the new application has been approved by GACC. You can complete Steps 1, 2 and 3 of the new application before submitting the cancellation application in CIFER to minimise the length of this period.

2.2.6 Q: What information and documents that I submit to MPI will be sent to GACC? (For new and modification applications)

A: All the information in your China Application form, your Modification Request Summary (MRS), and any attachments required in the China Application form are submitted to GACC as part of the CIFER application.

The (paper) China Application form and the China Registration Conditions forms that the operator has completed, and the verifier has signed do not get uploaded to CIFER or sent to GACC. Where required, a clean version of this document for submission to GACC will be uploaded to CIFER as part of the MPI recommendation. There are some exceptions to this, and this will be communicated on a case-by-case basis by MPI to relevant operators.

The supporting documents that you have shown your verifier as part of the China Registration Conditions verification step usually don't get uploaded to CIFER or sent to GACC (unless requested by them as part of their review of a specific application). However, for some product categories and application types, GACC does expect these to be submitted in CIFER (eg infant formula, pasteurised milk, new meat applications, meat applications where a new product type is being added).

2.2.7 Q: I want to change my name (or address, without location change) but my current MPI Notice of Registration states my old name and/or address. How do I prove to GACC that my name/address has changed?

A: We recommend at Step 1 (during your self-assessment) that you ask MPI Approvals (CountryListings@mpi.govt.nz) for a 'MPI Notice of Registration for GACC Purposes' that shows your new name/address. You will only be able to request this if you have submitted the appropriate form to MPI Approvals (eg AP5, AP50) and this has been approved by MPI. This 'MPI Notice of Registration for GACC Purposes' will show your new name/address and include a watermark stating "Name/address change approved by MPI. MPI registration

database will be updated once GACC has approved this change". This is what you should then upload into CIFER for the 'Licensed production certificate issued by the competent authority of the country (region)' attachment required.

2.2.8 Q: I need to do a name or address change, but my MPI information (in the RMP/RCS/ULI) is already up to date – it's just my China listing that doesn't match. What do I need to know?

A: You can apply to update your company name as part of a modification. You can also apply to update your company address as a modification, but only where the physical address hasn't changed (e.g. your physical location hasn't changed, but your street has been renamed, or was initially incorrect on the China list). If your physical address has changed, you will need to apply for a **new** registration.

In all cases:

- ensure your Country Listing application form (eg AP20, DP2, AP32) states **exactly** what the name and/or address change is before your verifier signs this.
- Your other documents should be completed using the new version of your information (e.g. new company name/ address).
- You will need to include a new row describing the change/s applied for in your Modification Request Summary.
- For name changes, make sure you have entered the new name into your CIFER application.
- For address changes, you cannot change this in CIFER and so MPI will ask GACC to do the change on your behalf.

Please contact CountryListings@mpi.govt.nz if you any concerns about your RMP registration details not matching your current China listing details.

2.2.9 Q: After the modification is approved by GACC, if we want to export a new product which uses the same HS-CIQ code as other products that are already registered with GACC, do we need to apply for a modification again to update the existing registration to include the new product?

A: MPI is not sure whether GACC will require, at border clearance, that you have the specific details of the product under your registration (eg product name, brand, packaging format) or whether it is enough that the product comes under the same HS/CIQ code to one that is already in your current registration.

2.2.10 Q: For the onsite audit in the verification step, are there any requirements for the product to be manufactured during this audit?

A: Not always. This is up to the verifier to confirm, as they must be confident that what is declared in the applications forms is true and correct and can happen in practice, before they sign the forms. For example, if there is a similar product being manufactured at the time of the onsite audit, then this may be accepted by the verifier.

2.2.11 Q: Can we add an additional manufacturing site address during the modification stage?

A: No. GACC registrations are per manufacturing site location and so you can't have a registration that has more than one address. You will need to apply for a new GACC registration for any additional manufacturing site locations.

2.2.12 Q: What if my site is currently suspended by GACC? What can I do to ensure my renewals/modifications can be progressed?

A: Suspended establishments can't apply for renewals while they are still suspended by GACC. MPI Market Access will be communicating with GACC directly regarding the current

suspensions, however it is still advisable that the operator carries on with preparing for their applications while the suspension is being sorted (eg complete Steps 1, 2 and 3 and be ready to enter the application into CIFER once the suspension if lifted by GACC).

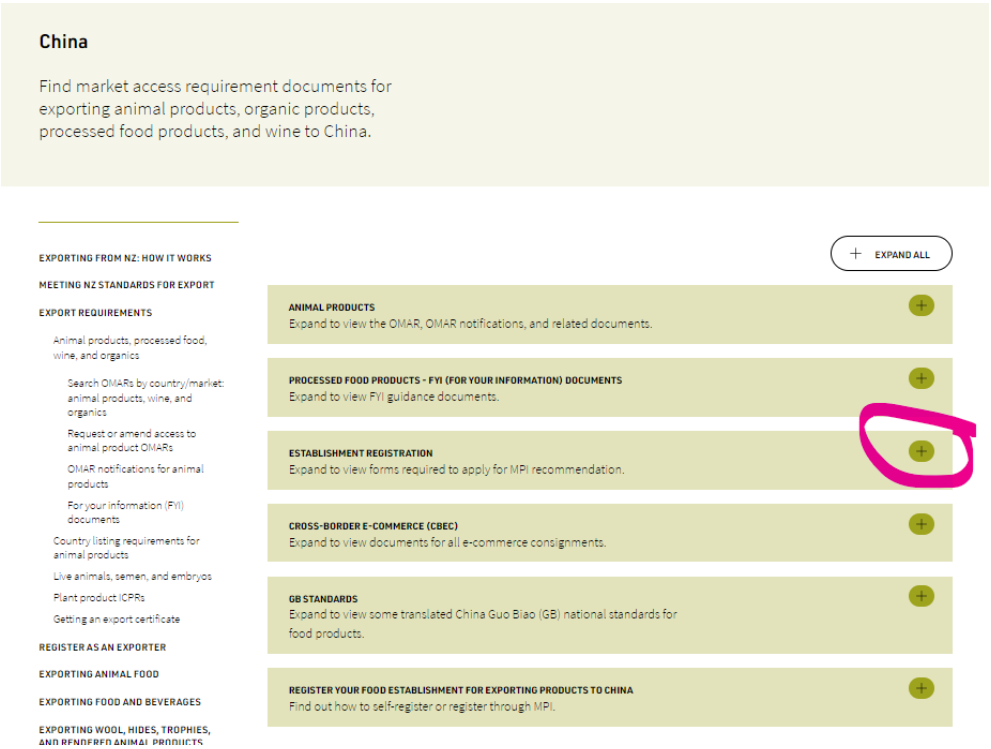
2.3 Completing the forms

2.3.1 Q: I am uncertain whether I am downloading the right version of the form from the MPI website. How can I make sure the form I'm using is the most up-to-date version?
A: Make sure you regularly clear your internet browser cache. If unsure how to do this, check with your IT team or search for instructions using "how to clear my internet browser cache". For example, on Google Chrome, click the three dots at the top right of your browser, then select 'More tools'>'Clear Browsing Data'> Select 'Cached Images and Files' and click 'Clear Data'.

Note that when you click on the form link, the most recent form will be downloaded and you can find it in your Downloads folder.

2.3.2 Q: I have started completing my operator self-assessment using forms I had downloaded previously from the MPI website. However now I have noticed that there is now a newer version of the same form on the MPI website – should I start again using the newer form?
A: Yes, you should use the latest version of the forms that are on the MPI webpage. Changes from the previous version are be highlighted in yellow so you can clearly see what has changed.

2.3.3 Q: Where can I download the required forms required for China registration/listing applications?
A: You can find and download the required forms from MPI's China webpage, under 'Establishment Registration'.



2.3.4 Q: What forms do I need to complete and send to MPI for a new China listing application?
A: You need to complete the following forms:

- Country Listing application form:
  - AP20(2) for meat, casings or aquatic products (exception: use AP20(3) if you are changing site address or company name)
  - DP2 for dairy
  - AP32 for bee products
- China Registration Conditions form
- China Application form
- Declaration of the Manufacturer
- Any other attachments that you have prepared when completing the China Application form (identified in the form by 'Attachment required'

The Country Listing application form, China Registration Conditions, and China Application form need to be signed by your verifier.

2.3.5 Q: What forms do I need to complete and send to MPI for a China listing modification?
A: You need to complete the following forms:

- Country Listing application form:
  - AP20(2) for meat, casings or aquatic products (exception: use AP20(3) if you are changing site address or company name)
  - DP2 for dairy
  - AP32 for bee products
- China Registration Conditions form
- China Application form
- Country Listing Request Summary (Excel). For modifications applications made up to July 2023, use this version: Modification request summary – Version for June 2023 modifications
- Declaration of the Manufacturer
- Any other attachments that you have prepared when completing the China Application form (identified in the form by 'Attachment required'

The Country Listing application form, China Registration Conditions, and China Application form need to be signed by your verifier.

2.3.6 Q: What forms do I need to complete and send to MPI for a China listing renewal?
A: You need to complete the China Registration Conditions form (signed by your verifier) and a Renewal Declaration of the Manufacturer (signed by your company's legal representative, as declared in CIFER).

2.3.7 Q: I am doing my renewal application and the first requirement in the operator self-assessment checklist (China Registration Conditions form) is that I need to complete a China Application form. I didn't think I needed to complete a China Application form for a renewal – am I right?
A: Yes, you are correct -renewal applications do not need a China Application form to be completed and submitted to MPI. For this Item 1.1 in the Registration form, just check that the current information in your CIFER registration is accurate, and if you are happy it is, you should tick Yes or Conforming. Include a statement along these lines in the box below, and no supporting document is required.

2.3.8 Q: Are there any important things I should know when completing the operator self-assessment against the China Registration Conditions form?

A: For each Item (requirement) in the China Registration Conditions form, there are 3 key things you need include:

- **Tick** (ie Yes, Conforming or N/A)
- **Comment** in the box underneath about **how** you meet the Item (requirement) – just a few sentences
- **List supporting materials** in the box underneath that show how you meet the Item (requirement).

Make sure for each applicable Item (requirement) in the China Registration Conditions form you can tick 'Conforming' or 'Yes'.

For some questions there is an 'N/A' option, which is fine to select, where accurate. If you believe a question is 'N/A' (such as a cold store being asked about processing capacity) but there is no 'N/A' option, please tick 'Yes' or 'Conforming', then explain in the comment box why the condition is not applicable to your operation.

MPI cannot recommend your application if you are 'Non-conforming' or answer 'No' to any conditions.

2.3.9 Q: Do I need to send MPI or GACC my Supporting materials (that I have listed in the China Registration Conditions)?

A: The Supporting materials are needed to demonstrate to your verifier that you meet the requirements you say you are. You do not need to send these to MPI or upload these to CIFER for GACC to review, unless specifically asked to. You should make sure the document filenames match what you have listed in your China Registration Conditions, and that you have these readily in case MPI or GACC request to see these.

2.3.10 Q: There's a lot of guidance, highlights, italics, etc. in the different forms – should we delete this?

A: There is no need to delete guidance or highlights from the China Application form, China Registration conditions form, or your Country Listings application form (AP20, DP2, AP32). The paper copies you complete do not get sent to GACC. There are two documents you should remove highlights or guidance from:

- **Modification request summary**. This document contains specific guidance/instructions for completing the form, including the removal of certain highlights or text. Please carefully follow these instructions for what needs to be removed in this form, as once finalised, you will be uploading a PDF copy to CIFER and this will be submitted to GACC.
- **Declaration of the Manufacturer** (new/modifications) or your **Renewal Declaration of the Manufacturer** (renewals). Please remove any yellow highlight.

2.3.11 Q: Do I need a company stamp and what are the requirements for the company stamp?

A: It is recommended that you have and use a company stamp which contains at least the company name and company logo (if you have a logo). Historically GACC has expected to see this.

2.3.12 Q: What is the attachment in the China Application form "Licensed production certificate issued by the competent authority of the country (region)"?

A: This is your proof of MPI registration, which will be one of the following:

- RMP Notice of Registration
- ULI Validity statement (see Dairy FAQ for more information)
- Food Act Notice of Registration for your National Programme or Food Control Plan (may be issued by a Territorial Authority)

For those with RMPs, you may notice your current RMP Notice of Registration includes a suffix like "/01" or "/02", while your China listing details do not include this suffix. Because of this, when you complete Step 3 Request for MPI recommendation, MPI will send you an updated version of your RMP Notice of Registration to use for CIFER.

2.3.13 Q: I only have an old version of my RMP Notice of Registration (eg with NZFSA branding) to use for my proof of MPI registration that's required as an Attachment to the China Application form in Step 1 - is that ok?

A: That's fine. You may notice your RMP Notice of Registration includes a suffix like "/01" or "/02", while your China listing details do not include the suffix. Because of this, when you complete Step 3 (Request for MPI recommendation) MPI will send you an updated version of your RMP Notice of Registration that to upload into CIFER.

2.3.14 Q: Does it matter which order the forms are completed in?

A: Your Renewal Declaration (for renewals) or Declaration of the Manufacturer (for new/modifications) must be dated the **same date or later** than the date at the top of the first page of your China Registration Conditions form (called 'Date the form was completed'). This is because when your Legal Representative signs the declaration, part of what they are signing is that the establishment can meet the relevant regulations of China and Decree No. 248, so you will need to complete the China Registration Conditions form first to be sure that you can conform and so can sign the declaration.

2.3.15 Q: MPI has asked me to correct then re-sign a document after I have submitted it to MPI – do I need to update dates on anything else?

A: When MPI asks you to re-sign a document, you only need to re-sign and date that document. You do not need to re-sign/re-date any other documents that weren't included in MPI's feedback. Any rules about the order of when forms should be completed in are not relevant when MPI asks you to re-sign a form.

2.3.16 Q: When completing a renewal application and submitting to MPI does it matter that the relevant forms are completed and dated prior to the China CIFER renewal window opening?

A: No, the forms can be completed and dated prior to the CIFER renewal window opening.

2.3.17 Q: Who is my legal representative? Where do they have to be based?

A: Guidance in the China OMAR states " *MPI understands that the **legal representative** is a person representing the registered establishment who is responsible for the food safety of the products manufactured or stored at the establishment and exported to China (for example, a director of a limited liability company, the owner of a sole trader, a partner in a partnership, a trustee of a trust). The name of the legal representative is included in the application and the representative is required to sign some of the application documents, for*

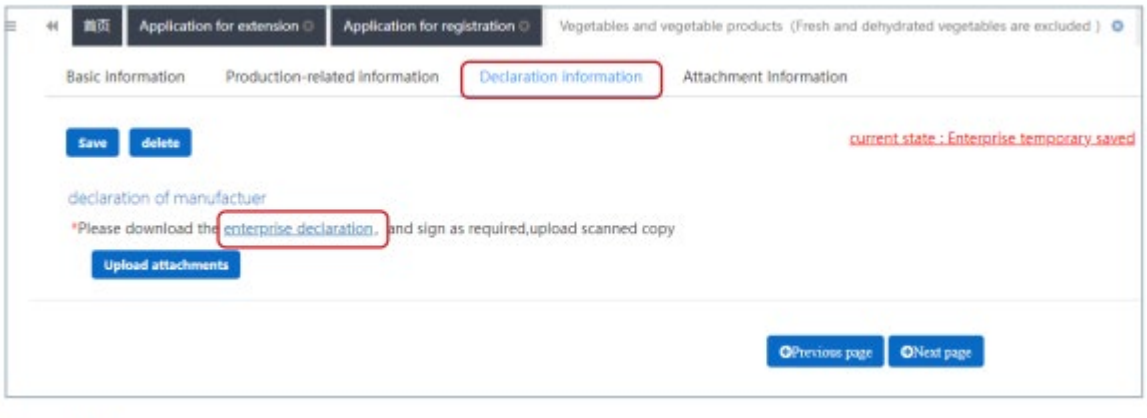
example the company's Manufacturer Declaration to GACC. This should be a person located in New Zealand".

2.3.18 Q: I understand that I need to complete a Country Listings application form for my modification application, however, the name and address of our establishment is not going to change. Which form should I use? (meat, casings, and aquatic products)
A: The AP20(3) form is the form to fill out if there is a change in physical address or name of the business. If there are no changes to either the name or physical address, please fill in the AP20(2) form (Premises listing for Non-EU Countries) instead, even if you want to make other changes to the listing.

2.3.19 Q: Where can the Declaration of Manufacturer (for new/modifications) be found?
A: Under the 'Establishment registration' heading on the China OMAR page, click the '+' button to expand the dropdown. You can find a link to download the Declaration of the Manufacturer under the subheading 'Manufacturer Declarations'.

Alternately, you can download this from CIFER. Once logged in:

- Select 'Application for Modification' on the left-hand side of the screen.
- Select your relevant registration (ie by product category).
- Navigate through the pages (tabs) to find a link to the 'Enterprise Declaration'. This is typically located in a tab called "Declaration Information", or "Check list and statement". Note, the exact wording/translation, or the specific tab this is located in may vary by product/registration type. For aquatic products, it can be found at the bottom of the 'Production-related information' tab.



2.3.20 Q: How do I complete the Declaration of Manufacturer (for new/modifications)?
A: Please ensure:

- Your declaration is signed by the company's Legal Representative (and the Legal Representative's name exactly matches the name declared in your registration in CIFER, where applicable)
- The correct establishment name is written in the declaration (to match your current MPI China country listing name). Please check spelling and name matches **exactly** (e.g. 'Ltd.' vs 'Limited', 'New Zealand' vs 'NZ' vs 'N.Z.')
- The correct China Registration Number (starting with CNZL) is written in this declaration to match https://ciferquery.singlewindow.cn/ . Note for **meat** operators, you will have a different CNZL number for **each** species, and will need to complete a separate declaration for each
- The date that the Legal Representative signs the declaration must not be before the 'Date the form was completed' in your China Registration Conditions (it can be the same date or after)
- Remove any yellow highlight.

2.3.21 Q: Where can the 'Declaration for the extension of registration' / Renewal declaration (for renewals) be found?

A: A document in Chinese text is available to download in the CIFER renewal application, but MPI recommends using this bilingual version that we have prepared: Declaration for the extension of registration' (bilingual template).

You can also find this under the 'Establishment registration' heading on the China OMAR page, click the '+' button to expand the dropdown. You can find a link to download the 'Declaration for the extension of registration' (Renewal Declaration) under the subheading 'Manufacturer Declarations'.

2.3.22 Q: How do I complete the Declaration for the extension of registration' / Renewal declaration (for renewals)

A: Please ensure:

- Your Legal Representative writes their name and position within the company.
- Your declaration is signed by the company's Legal Representative (and the Legal Representative's name exactly matches the name declared in your registration in CIFER where applicable).
- The correct establishment name is written in the declaration (to match your current MPI China country listing name). Please check spelling and name matches **exactly** (e.g. 'Ltd.' vs 'Limited', 'New Zealand' vs 'NZ' vs 'N.Z.')
- The correct China Registration Number (starting with CNZL) is written in this declaration to match https://ciferquery.singlewindow.cn/ . Note for **meat** operators, you will have a different CNZL number for **each** species, and will need to complete a separate declaration for each.

- The date that the Legal Representative signs the declaration must not be before the 'Date the form was completed' in your China Registration Conditions (it can be the same date or after).
- Remove any yellow highlight.

2.3.23 Q: For specific documents required to be uploaded into CIFER that are part of our RMP (e.g. floor plan), can we attach the RMP in full or do we need to specifically attach the individual documents in the China Registration Conditions?
A: Individual documents should be attached separately where required. Please ensure that:

- Concise and descriptive file name/s are used.
- The identical file name/s are listed in the China Application form and China Registration Conditions (as required) so the attachments can be easily identified and found if required.
- Only parameters related to product made for China are included in the attachment (where relevant), eg for process flow diagrams, only show raw materials and processes that are used for China products.

2.3.24 Q: Where the operator is taking photos to show the verifier for their supporting documentation, does the verifier need to verify the quality of the photos?
A: MPI has received no specific guidance on the specifications and quantity of photos provided to a verifier. They should clearly display the relevant features of the object of interest and, along with other explanations/evidence, satisfy the verifier that the required outcomes can be met in reality. Where an onsite audit is required for GACC country listing applications, the verifier should also ensure they have recently sighted the area/equipment that the photo is of as part of the reality check in Step 2 of the listing process.

2.3.25 Q: Is the year of export information by season or calendar year?
A: Calendar year

2.3.26 Q: On the China Registration Conditions there is a requirement about medical examinations of employees, but we don't require these, what should I answer?
A: If medical examinations are not required by the company, describe your RMP procedures for staff health and notifiable infectious diseases that ensure an equivalent outcome is met.

2.4 Product Categories and HS/CIQ codes

2.4.1 Q: How do I know which product categories my products come under?
A: You should know the HS/CIQ code for your products. You can use the CIFER search in 'Product Type Query' to search the HS/CIQ code and this will show you which product category GACC defines the product as being part of.

2.4.2 Q: My site processes/stores product for export to China under different product categories, do I need to register the site for each product category separately?
A: Yes, you will need to apply for GACC registration per product category.
Note that:

- For meat, one application is required per species that is processed/stored for China: bovine, ovine/caprine and cervine.
- For Food for Special Dietary Use (FSDU), one application is required per sub-category: Soy-based infant formula; Formula for special medical use; Complementary food for infants and young children; Other (eg food supplements, sports nutrition food etc).

2.4.3 Q: Are all the different products categories, eg meat, dairy, fish etc under the same CIFER login (RMP specific) or are there separate logons for each product category?

A: Your CIFER login is specific to your MPI Registration number (ie specific to your RMP, RCS, ULI or Food Act Registration). Note: if you were sent your CIFER username by MPI in late 2021, this means the username was assigned by GACC when they were setting up CIFER and adding all of the current registrations, and the username will be one of that establishment's China Registration number (ie starting with CNZL). So, for example, even if your CIFER username is your CNZL number for aquatics, this will log you into CIFER for **all other current registrations** as well.

Once you login you'll see all the GACC registrations that are currently active (approved by GACC) for that MPI Registration Number. (Note for Food Act registrations, this may also be your Territorial Authority Registration number).

2.4.4 Q: How do I find my HS/CIQ codes that are required in the China Application form and CIFER?

A: New Zealand exporters should work with their importers and/or agents in China to confirm the HS/CIQ codes used to import the products into China. You can also search specific HS codes using the CIFER search function 'Product type query'. It is important you get these right and include them in your CIFER modification, as only products that are included in the site's registration information in CIFER will get a Customs clearance at the Chinese border.

2.4.5 Q: What happens if I don't have the right HS/CIQ codes in my registration?

A: It's important to work closely with your customers/importers/agent in China to confirm all applicable HS/CIQ codes and include them in your registration. If the HS/CIQ code used by your importer on the China import entry are not within scope of your registration, its highly probable that you will run into border clearance issues.

2.4.6 Q: For the HS/CIQ code, where do we get the English version as it's Chinese in CIFER system?

A: This is usually something you can translate by using the "Translate to English" function in your web browser. For example, Google browser users can right click and choose 'Translate to English' or select the English option at the top of the page.

2.4.7 Q: While searching for a HS code, the CIFER system has the remark: "if the HS/CIQ code of relevant product is not found, your product does not need to apply for overseas enterprise registration in this system at present." In this case, what should we do?

A: This search result tells you that, according to the CIFER system, that specific product does not need the overseas manufacturer/storage establishment to be registered with GACC under Decree No. 248. However another GACC establishment registration may be required for the product - refer to the China OMAR and contact ChinaCountryListings@mpi.govt.nz if you are unsure.

2.4.8 Q: Is there any easy way to get a list of all the HS/CIQ codes? Whilst verifiers are not required to verify HS/CIQ codes and it is suggested the operator check these with their importer, operators that don't have an importer may find these difficult to find.

A: You could use this non-MPI resource:
Decree 248 Product List Update – September 2023. This is the Global Agricultural Information Network (GAIN) report published by the United States Department of

Agriculture (USDA), which contains a link at the bottom of the report (under 'Attachments') leading to an Excel spreadsheet with collated HS/CIQ codes and product name and description under Decree 248 as of 12 September 2023. The "Inspection and Quarantine" descriptions have improved to make it clearer which GACC/CIQ Inspection and Quarantine code applies. You may wish to look to see if a newer version is available as things can change quite quickly in CIFER. This is for reference only as the exact codes may have changed since the report was published, so you should double check in CIFER (in Product Type Query) before using the HS/CIQ codes.

2.4.9 Q: Do I need to do a modification every time I want to add an HS/CIQ code to a registration?

A: Yes, you need to apply for listing modification to be able to add new HS/CIQ codes that are not already listed in scope of your registration, or to be able to add the compulsory product information into CIFER for that HS/CIQ code (where you didn't do that in your June 2023 modification) . Just make sure that the scope of your MPI-registered risk-based measure (eg RMP) covers the products that you apply for, and that you have established procedures that would support the manufacture of these products.

When you are completing the China Application form for the modification, you only need to include the new products (HS/CIQ codes) you want to add to your registration in the product table question.

You can list any HS/CIQ codes for your product category provided:

- NZ has market access for the product
- Your Risk based measure (RMP, RCS or FCP or National Programme) scope covers those products,
- You have established procedures that would support the manufacture of these products, and
- You are able to meet the applicable China Registration Conditions for those products.

2.4.10 Q: In the CIFER product table, do you need to list down ALL products manufactured or stored for export to China in the HS/CIQ code table (Ie one table row per product), or just one example of a product for each HS/CIQ code to represent all the other products with the same HS/CIQ code?

A: You need to list down all products according to their individual 13-digit HS/CIQ code. You can choose to do this using one row per HS/CIQ code (ie write details about all the products all in this one row), or you can enter multiple rows per HS/CIQ code (ie one row per product). Please see Meat section of this document for specific guidance for meat.

3 Meat

3.1.1 Q: Country Listing application form (AP20) – do we need one per species?
A: You can combine your species on one AP20 per RMP (just make sure you're clear on the form which ones you're applying for). For all other forms (ie China Application form, China Registration Conditions, Modification Request Summary), you will need to complete one per category / per species.

3.1.2 Q: I've already completed a self-assessment against the China Registration Conditions form previously for a previous application, can I use the same version for my next application?
A: You should base your operator self-assessment on the most recent version that you had completed previously, but you will need to review all the China Registration Conditions again as part of your self-assessment (Step 1) to make sure nothing has changed (or update where anything has changed), and that you still conform to the applicable Items. Once you have reviewed your China Registration Conditions, enter the date of your review into the date at the top of the form ('Date the form was completed'). Your verifier will need to complete Step 2 (Verification) fully again, including any onsite audit where required in the China OMAR.

3.1.3 Q: Does beef/bovine include bobby calves?
A: Yes, bovine meat includes bobby calves.

3.1.4 Q: Does sheep/ovine include goats?
A: Yes, caprine/ovine are in the same product category, often called 'sheep meat' or 'mutton' by browser translations

3.1.5 Q: For a multi species establishments do we need to complete a separate listing application for each species?
A: Yes. You need to complete a separate listing application for each species: bovine, ovine, cervine.

- For new, this means you need to complete a separate China Registration Conditions form and China Application form for each species. Your AP20 form can encompass all three applications.
- For modifications, this means you need to complete a separate China Registration Conditions form, China Application form and Modification Request Summary (Excel) for each species. Your AP20 form can encompass all three applications.
- For renewals, this means you need to complete a separate China Registration Conditions form for each species.

3.1.6 Q: Can a multi species establishment/store with a China listing for only one species add additional species in a modification application? Eg If we only have a bovine listing, can we add a listing for ovine/caprine and/or cervine by following the modification process?
A: No. There are three meat categories for different meat species: 1. bovine 2. ovine/caprine 3. cervine. You need to have the right one for your products. You need to have a bovine listing to specify any bovine products, and will not be able to add any bovine products under an ovine/caprine listing. If you only have an ovine/caprine listing, you will need to apply for a new bovine listing to be able to add bovine products.

Within your species listing, you can include products you don't currently export to China to futureproof your registration, as long as:

- they fit into that category
- you have equipment/processes to make these products and
- they're in scope of your RMP
- VS verifies that for an application for such products the operator would also need to demonstrate that they can produce the products in accordance with OMAR requirements.

3.1.7 Q: We are a meat establishment with an integrated cold store and currently consolidate product for species other than which we are China listed for under slaughter and processing activities (eg we are a bovine processing plant but we store ovine from other establishments on our China relationship matrix). Do we need to apply for a separate CIFER registration for ovine storage?

A: Currently the China OMAR Part for meat allows meat establishments (ME's) with integrated cold storage to consolidate product from other ME's on their establishment relationship matrix and that this may include species other than what they process. The OMAR guidance was based on then published GACC registers which were not clear on storage at the processing establishment according to species and the practice was not questioned at GACC audits as long as it was in compliance with the matrix.

However, the published GACC registers have now been superseded by requirements for CIFER registration. The CIFER registration requirements for stand-alone cold stores are now by individual species ie a separate registration is required for bovine, ovine/caprine and cervine if they are storing all these species for China export.

This expectation may now extend to processing establishments. Ie if a meat processing establishment wishes to store products of a species other than which they are slaughtering, they may need to complete and submit a separate **new listing application** if they are not already registered for this species. This issue will be discussed with industry and MPI is not currently inviting new applications under this category.

3.1.8 Q: Should we make a new application for tripe if we already had made an application previously and was never approved by GACC?

A: Yes, you will need to include this in your listing modification as per the listing process for modification that is outlined in the China OMAR. If you have already had the SAT approval for this, you will not have to do this again, unless your verifier considers this necessary.

3.1.9 Q: We had our SAT audit for tripe several years ago and we now want to add tripe to our listing as part of our modification - how recent does the SAT audit need to be to add this?

A: MPI is not stipulating a cut-off date for the SAT audit. Please discuss this with your verifier. MPI VS verification is required to confirm that processing remains consistent with that observed at the time of the SAT audit.

3.1.10 Q: For premises that slaughter both bobby calves and adult beef there are separate chain speeds. CIFER only allows one speed to be entered. Which chain speed should I enter?

A: It is recommended to enter the chain speed for adult beef.

3.1.11 Q: For premises that slaughter both bobby calves and adult beef, what information should I enter into CIFER?

A: Please use **total** figures (both bobby and adult) where you can. But for questions you can't differentiate, use your figures for adult beef and MPI can always explain this to GACC if required.

3.1.12 Q: For deer premises, would velvet listing and meat listing be completely different applications or will velvet be included within deer red meat listing as a different category?

A: For velvet capsules: MPI understand these come under the Decree No. 248 category of 'health food'. This will depend on what the HS/CIQ code is that it is being imported into China under. Once you know this, check the Product Type Query function in CIFER.

For frozen velvet sticks, sliced velvet, dried velvet and powdered velvet other than in consumer-ready form (eg in capsules): establishment registration is not under Decree No. 248 process. It is required by GACC however, and the registration process is in the China OMAR.

3.1.13 Q: Is there any issue if the local VS verifier/signatory changes during the process of the application?

A: The final verifier signing off the China Registration Conditions and China Application form should be satisfied that all the requirements can be met. If there have been verifier changes throughout the process, it is up to the Verification Agency and the verifier remaining to ensure they are sufficiently confident to sign the relevant forms. Any verifier with the relevant authorisations can deal with the renewal or modification applications.

3.1.14 Q: Is there a timeline for NEW meat registrations?

A: There are no deadlines that an operator must meet for new meat registration applications. Operators of establishments that are considering applying for new meat registration with China should email ChinaCountryListings@mpi.govt.nz to let them know in advance, as meat registrations are batched and submitted to GACC no more frequently than monthly.

3.1.15 Q: Do we need to complete a relationship matrix?

A: It's not compulsory to complete the "Production correspondence" but China listed meat premises are required to conform to the relationship matrix. Please leave this section blank and MPI will submit updates of both the establishment and signatory matrices when premises are approved by GACC.

3.1.16 Q: How do we complete the Refrigeration and storage capacity in CIFER?

A: The "refrigeration capacity" (tons/day) – referred to as "ice making capacity" in the China Application form - refers to blast freezer capacity. The "refrigerated storages capacity" (cubic metres) refers to chilled storage. The "storage capacity of freezers" (cubic metres) refers to capacity of freezers not including the blast freezers.

3.1.17 Q: Who is our Accredited agency

A: For meat establishments conducting slaughter and dressing, this will be AsureQuality who conduct official inspection. For further processing premises and stand-alone cold stores please enter "MPI Verification Services"

3.1.18 Q: How accurate does data for storage and production capacity need to be?

A: Note that MPI reports on total production volume at processing premises and the volume of China exports on a quarterly basis. While export data (for China and other export

destinations) does not appear to be a compulsory entry on CIFER, it is possible that GACC may request this information.
The three-monthly reports do not include storage information. However, the data provided may be subject to a future systems audit and must match reality. The data, once modifications to complete compulsory information are approved, will also serve as the reference should further modification application for future re-construction/expansion be required.

3.1.19 Q: For some HS/CIQ codes there are multiple products/cuts for which that HS/CIQ code could be applicable. For example, 0204420000 101 (Frozen bone in sheep meat) would be applicable to many cuts such as bone in French rack, bone in saddle, bone in square cut shoulder. Would we need to enter each of these cuts into CIFER?
A: Although you may choose to do this (by selecting the relevant HS/CIQ code and repeating it for separate entries for the cut descriptions as free text), MPI is not requiring that you do so. It is important that information regarding the HS/CIQ code, the 'Type of Products' and 'Specific products for export to China' is adequately captured in the second table in CIFER (called 'Products to be registered/added to China'). This information must also be entered in the Product Table in the China Application form.

Please also note that if there are any **added products** (ie product that is not in your current GACC registration, but that you are applying to add as part of the modification application), this must also be advised to GACC via adding an extra row in the Modification Request Summary (a single row entry for all products to be added is sufficient). It is the product type (pertaining to the corresponding HS/CIQ code) that is included here. The HS/CIQ codes do not need to be added. The MIA have a sample template which can be provided on request.

3.1.20 Q: How do I complete the product description for an HS/CIQ code when there is a character limit?
A: When completing a new or modification application in CIFER, under the 'Product Information' tab, you should refer to the China Catalogue for a product description http://43.248.49.223/AP_NameListSearch.aspx?type=%u8089%u7c7b. If you find the link doesn't work when you click on it, copy and paste the text into your browser. It takes you right to the meat list as shown below. Translate to English, then click on Oceania tab (which shows Australia and NZ). Scroll down until you see New Zealand then pick which product name best fits your product.

If the product name is still too long you can shorten it, as needed, to make sense. For example, instead of 'Other offal (frozen sheep bone marrow)', this can be shortened to 'Frozen sheep bone marrow'.

4 Casings

4.1.1 Q: In CIFER, is the refrigeration and storage capacity section compulsory for casings modifications?
A: Yes

4.1.2 Q: Do stand-alone or non-integrated storage sites require casings registration or is it just slaughter/processing plants needing GACC registration?
A: GACC registration (and therefore MPI China listing) for casings is only currently required for establishments that process frozen or salted casings. Standalone storage sites do not currently require GACC registration or MPI China listing for casings.

5 Aquatic Products

5.1.1 Q: Is 'aquatic product' the same as 'fish and fish products' according to GACC
A: Yes, in the context of Decree No. 248, 'fish and fish products' are classified as 'aquatic products' (excluding live seafood). The GACC definition of "Aquatic products" also includes plant products such as seaweed not covered under the Animal Products Act.

5.1.2 Q: What address should I use for a vessel?
A: If unsure, check the address on MPI's MPI List for China: Fish and fish products establishments and use this.

5.1.3 Q: I operate a vessel – should I use the company name or vessel name for the 'enterprise name' in the Manufacturer declaration?
A: Please use the Vessel Name (which should match the 'Name of the Establishment' listed on the MPI List for China: Fish and fish products establishments)

5.1.4 Q: On the China Registration Conditions form for Aquatic Products, Item 2.3 says 'Provide photos of ceilings, walls, windows, doors and the floors, including a list of materials.' Will a couple of sample photos do?
A: This should be discussed with your RMP verifier. If the verifier has sufficient knowledge of the facilities, photos of some areas may not be required. If you do provide photos to your verifier as supporting documents, while MPI has no specific requirements on the specifications and quantity of the photos, the photos should clearly display the relevant features of the object of interest and satisfy your verifier that the required outcomes can be met in reality.

5.1.5 Q: We operate a standalone cold store; can you have HS codes on your modification application that you don't currently export? Trying to establish whether we can list HS codes we may use in the future?
A: Yes, as long as your verifier has verified that you have the capability and meet the requirements in the China Registration Conditions to store those products for export to China.

5.1.6 Q: For the 'Previous 2-year export history' in the China Application form, if we pack containers for customers who are exporters but are not an exporter ourselves, do we fill this section in?
A: Yes, it would be recommended you fill this section in with the products you pack regardless of the exporter. If precise information on product exported to China is not available provide an estimate. This section is does not appear to be compulsory in CIFER, for modifications, however entering information may reduce delays in the processing of applications if the information is required following assessment by GACC.

5.1.7 Q: The China Application form states I must prepare a 'Floor Plan'. What should I include in this document?
A: Include an RMP document that shows the floor plan of the enterprise`s factory, including production areas and cold storage / freezer areas. (Note that 'workshop' as referred to in the China Application form refers to the processing areas – it doesn't refer to any non-production areas or storage areas). Ensure you clearly mark the flow of products and people including entry and exit points. Separate processing areas should be clearly shown for multiple product types or processing methods. These markings can be done neatly using pen if needed.

5.1.8 Q: Can 'frozen sounds' be listed for export to China?
A: As seen on the GACC's Catalogue of NZ Aquatic Products that have market access into China*, NZ has market access for **Ling (*Genypterus blacodes* [frozen etc.])**. However, it is unclear whether dried or frozen ling maw (sounds) has access. Operators may choose to

include these products however there is a risk that GACC may decline the application due to lack of market access.

*The GACC catalogue where you can look up aquatic products for which NZ has market access for in China: Catalogue Information System of Food Exported to China from Countries or Regions That Meet the Requirements of Evaluation and Review and Have Traditional Trade You may find it helpful to translate this page into English using the translate function in your browser.

5.1.9 Q: For stores who have received interim live seafood storage listing, does live seafood and HS codes need to be included in the China Application form?

A: The registration process for aquatic products under Decree No. 248 does not include live seafood. Contact ChinaCountryListings@mpi.govt.nz for more information about GACC live seafood establishment registration.

5.1.10 Q: I believe my China registration number is wrong in CIFER? How can I change this?

A: You cannot change your China registration number. Operators for aquatic products are advised that instead of the 4-digit number indicating product category (xxxx), their China registration number instead shows the 2-digit number for product category ('18') followed by the 'type of operation' (eg PP, CS, FF, FV). Note that in some cases the 'type of operation' may not be accurate, but this shouldn't affect their Customs clearance.

5.1.11 Q: For new and modifications for cold stores, what do I enter for 'Production capacity'?

A: If you're not able to enter free text to match your China Application form (e.g. 'not applicable, cold storage facility only'), please enter the total storage capacity against each entry (please ignore the units in CIFER, and enter this number as MT total capacity).

6 Bee Products

6.1.1 Q: If we have a supplier of some products that we sell into China as our own, does that supplier/manufacturer need to go through this registration/listing process as well? Or is it just us who needs to list as we are the premise of final control?

A: Only the establishment that carries out final manufacturing of bee products intended for export to China needs to obtain GACC registration and therefore MPI listing. The final manufacturing establishment is the one that undertakes final packaging of exposed bee products.

6.1.2 Q: If my product contains 40% honey and the others are non-bee product (good ingredients), would this be a bee product?

A: You should work with your Chinese importers to determine what your product is and what HS/CIQ code you should use for the import. Once you have confirmed the applicable HS/CIQ code(s), you can use the 'Product Type Query' function in CIFER to check the category of your products, and the method of registration required. If your product is not classified as a 'bee product' in CIFER and instead requires self-registration, you can contact MPI Exporter Help at exporterhelp@mpi.govt.nz for further support.

6.1.3 Q: In Appendix 1 of the China Registration conditions form it asks for different photos of things. Do I have to take these photos and send them to my verifier – even if my verifier knows what my site looks like already?

A: Yes.

6.1.4 Q: On the China Registration Conditions, is there an N/A option I can use?

A: You should be able to tick 'conforming' for all items in the China Registration Conditions form. You shouldn't move on to verification until you are able to conform to each of the requirements (MPI won't be able to recommend your application to GACC unless you are conforming to all the requirements). There is one item for water that has an 'N/A' option, but this should not be used (you should be able to tick 'conforming').

6.1.5 Q: One of my Bee products has health claims on it – is that going to be an issue?

A: If your product uses a health claim, it may be classified by China as a Health Food (not a Bee product). Health products need a separate registration to Bee Products, as they are a different category. Please note that SAMR filing or registration (a highly technical, extensive process) is a strict pre-requisite to GACC registration for Health Foods. So you should not make health claims about your bee products unless you already have SAMR filing or registration and will be registering for Health Foods.

6.1.6 Q: On the China Application form, how do I complete the Testing table for Q15 Enterprise testing capability?

A: There are four columns you need to fill in for this table. Please note that the 'Testing frequency (times/week)' must be entered in the units of tests per week, as these can't be changed. The 'Testing frequency (times/week)' field in CIFER will only accept whole numbers from 1 or higher. Operators that test less frequently than 1/week, may list multiple tests within one row of this table, so the testing frequency meets the data entry requirements (ie 1 or more per week).

6.1.7 Q: Can I use the HS/CIQ code 0410902900/104 in my application for bee products?

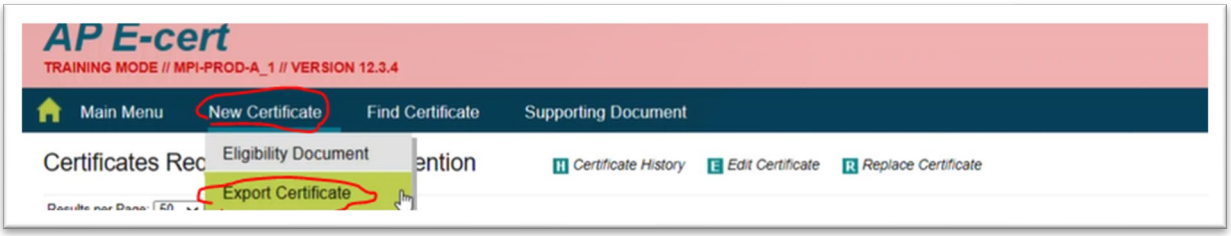
A: It has become clear during the bee products modifications that were carried out in 2023 that New Zealand operators cannot include the HS/CIQ code 0410902900 104 in a 'bee products' GACC registration.

7 Dairy

7.1.1 Q: How do I get the ULI validity advice statement?

A: For more information on the ULI validity advice statement, refer to F24/22.

To raise the ULI validity statement, login to E-cert. Then click the 'New Certificate' button, then the 'Export certificate' button.



Select NZ as the importing country and use the Template dropdown to find the NZ814. Click continue, and you'll then be able to edit in your site's details and submit.

When entering your site's details:

- Name: use the establishment name exactly as it is written in the MPI database
- Address: write Street Address and Town/City as it is written in the MPI database. Also include the Region - if you are not sure of what to use for Region, contact ChinaCountryListings@mpi.govt.nz or use the region noted on the list: China: Dairy (excluding infant formula) manufacturers.
- You will need to select a process to be able to submit the certificate. Please use the drop down to select the most applicable process for your operations.

If you are not a registered Animal products exporter, we recommend working with your export partners who can request the certificate in AP E-cert on your behalf.

7.1.2 Q: Do I have to use the ULI validity advice statement? Can I use my RMP Notice of Registration instead?

A: It's up to the operator what they would like to use.

The NZ814 (ULI Validity Advice Statement) was specifically designed to facilitate this registration where needed, but is not mandatory. However, the MPI registration number on the 'proof of MPI registration' document you use should match the MPI registration number associated with your CIFER account (for dairy this is your ULI). So if your RMP number if different to your ULI, the RMP Notice of Registration cannot be used.

If your RMP number is the same as your ULI number, you can choose to use your RMP Notice of Registration instead of the ULI Validity Advice Statement. If you choose this, please note this in your email when you submit your Step 3 Request for MPI Recommendation to Countrylistings@mpi.govt.nz, so that MPI can issue you an MPI Notice of Registration without the /01 in your RMP number.

7.1.3 Q: In CIFER, there are two tables – the first table is called either 'Product Registered in China' or 'Qualification obtained of Registered in China' and the second table is called 'Products to be Registered/Added to China' and this is empty. How do we use these tables in a modification application?

A: It appears that you cannot amend any of the rows in the first table in CIFER (named 'Qualification obtained of Registered in China'), even though there is now an 'EDIT' button available. In the modification application you should therefore add new rows (one by one) in the table called 'Products to be registered/added to China', adding all HS/CIQ codes that you need as per your verified China Application form.

7.1.4 Q: How do I know if my dairy products fall under China's definitions for 'dairy' or 'pasteurised milk', or even a self-registration category (ie are not defined by China as 'dairy')?

A: Use 'Product type query' to check your 13-digit HS/CIQ codes to confirm how China classifies your products.

7.1.5 Q: Our products are defined as 'dairy product' in New Zealand but defined under a non-dairy product category by China according to the HS/CIQ code, do we need to follow the process for China listing?

A: If the product is not defined by China as 'dairy product' (according to the HS/CIQ code) then you don't need to meet the requirements in the China OMAR. The exception is if you want to use the CN600 export certificate, in which case you **do** need to meet the relevant Parts of the China OMAR (including being on the MPI List for China dairy). However, if the non-dairy product (as defined by China) is the only product you are manufacturing for export to China, it is unlikely you will be able to meet the China OMAR as you will not be able to maintain your China dairy listing.

7.1.6 Q: If our product is not defined by China as 'dairy product' as per GACC category, and we self-register the product with GACC as non-dairy product, do we still need to meet the official assurance specifications and raise E-Decs for all transfers within NZ?

A: Yes, certification is still required for export eligible products between premises. However, if GACC doesn't define your product as 'dairy product', then you do not need to raise an export certificate when it comes to exporting the product.

7.1.7 Q: Are the verification activities for GACC and SAMR separate?

A: Yes, the verification activities for GACC and SAMR are separate. The verification activities that the verifiers are currently doing for GACC registration are for the purpose of MPI being able to sign the declaration that GACC requires from us when we recommend the registration application as the competent authority.

7.1.8 Q: Should a company select PP/CS if there is chilled storage of ingredients onsite or a freezer for probiotics?

A: MPI doesn't know what GACC expectations are for this. We do know that currently standalone dairy cold stores don't need to be registered with GACC. Our current recommendation is to select PP/CS for sites with large cold stores or for sites where the finished goods that must be stored chilled/frozen.

7.1.9 Q: When I am completing my China Registration Conditions for dairy, I want to tick N/A for some Items. Am I able to?

A: Yes, in some cases N/A answer can be relevant to your site (for example, Item 5.1 can be N/A if you don't receive in raw milk, Items 5.2 and/or 5.3 can be N/A if you don't receive in

these types of raw materials, and Item 8.3 can be N/A if you don't have a sterilisation step as part of your process.

However please consider the comments below before selecting N/A for these other specific Items:

- 3.2 Storage facilities: There is no N/A option. This item is relevant for ambient stores too and for any temperature-sensitive ingredients.
- 4.1 Water Management: There is no N/A option. This Item is also relevant for the water in the processing areas supplied to the staff handwash stations.
- 6.2 Production and Processing processes: This is likely to be applicable, as you should still reference a production flow chart and any key parameters such as blending, magnet etc. This is not only relevant to sites with heat treatment or liquid products.
- 6.3 Packaging: 6.3.1 refers to all pre-packaged products. You should be able to tick conforming if you have procedures to ensure that any retail ready product that is made for China in the future is able to conform.
- 8.1 Product online control checks: In this context, online means in-process. This is likely to be applicable, as you should still have online control (ie process control) measures to monitor hazards. This is not only relevant to liquid milks or temperature-controlled storage.
- 8.2 Finished product Inspection: This is likely to be applicable, as you still should have developed a testing plan and standard for final products that you intend to make for China.

8 Health Food

8.1.1 Q: Do I need to file or register with SAMR as well as GACC? Do I need a SAMR registration to get GACC registration?

A: Before you can apply for health food/dietary supplement manufacturer registration with GACC you must have completed State Administration of Market Regulation (SAMR) filing or registration and your products must have a registration number and symbol (also known as a blue hat). This is required for sale in the Chinese market, but not for products that are sold to consumers via Cross Border E-commerce.

The requirement for dietary supplements and health foods to have SAMR filing or registration prior to GACC registration came into force on 1 January 2022. Establishments that obtained GACC registration without having their products filed or registered will need to provide evidence of SAMR filing or registration as part of their 2023 modifications to be able to maintain their GACC registration.

8.1.2 Q: Can I get SAMR registration in time for my GACC modification?

A: SAMR filing is a process involving extensive product testing and a technical dossier. This is for dietary supplements which have as their active ingredients vitamins and/or minerals. All other products that claim health benefits and/or have food ingredients (ie functional foods) and/or active ingredients other than vitamins and/or minerals are health foods that require SAMR registration. SAMR product registration involves testing, a technical dossier, clinical trials and an on-site audit by SAMR.

MPI is not involved in the process of product registration or filing with SAMR. This means that we cannot step you through this process. Companies usually work with a consultancy firm in China and a lot of the work needs to be done by a Chinese company in the market. This is the relevant website for applying for SAMR filing or registration - http://www.cfe-samr.org.cn/

8.1.3 Q: Where do I find more information about manufacturing 'health food' for China?

A: F10/22 China Health Food

9 Food for special dietary use (FSDU)

9.1.1 Q: The China Application form for FSDU asks for "Registration approval certificate for foods for special medical purpose or infant formula foods for special medical purposes in China" does this mean we have to obtain the approval certificate first before we can maintain our GACC listing under this category?

A: Yes, it appears that GACC expects you to have SAMR approval for these types of products (infant formula and FSMP) before you can apply for GACC registration.