Ministry for Primary Industries
Manatū Ahu Matua

Guidance Document

China (GACC) Registration of Food Establishments

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Title

Guidance Document: China (GACC) Registration of Food Establishments

About this document

The General Administration for Customs for the People's Republic of China (GACC) has updated the China Regulations on the Registration and Management of Overseas Manufacturers of Imported Food, with Decree 280 (published in October 2025 and implemented from 1 June 2026).

This document contains general guidance on these regulations and is for operators who manufacture (and in some cases, store) food for export to China. It replaces the previous guidance document that referred to Decree 248 (which was superseded by Decree 280 from 1 June 2026).

Related Documents

Current guidance documents (FYIs) are available on the MPI webpage: For Your Information (FYI) documents, and those related to China are also linked on the MPI China OMAR webpage. Operators should check these webpages frequently and subscribe to MPI updates to ensure they are aware of the most up-to-date information.

China resources

(1) Regulations of the People's Republic of China on the Registration and Management of Overseas Manufacturers of Imported Food (Decree 280)

(2) GACC Interpretation of Decree 280

(3) GACC Announcement No. 27 of 2026 (Announcement on Matters Related to the Implementation of the China Regulations on the Registration and Administration of Overseas Manufacturers of Imported Food)

(4) GACC Frequently Asked Questions and Answers

MPI resources

Links to general guidance documents can be found on the MPI China OMAR webpage, under the heading 'Establishment Registration (CIFER)' and sub-heading 'Resources'.

For animal products exported to China:

- The China OMAR outlines the requirements and processes for requesting MPI recommendation for GACC registrations, covering meat, casings, aquatic products (except live aquatic animals), dairy products, dairy-based infant and young children formula, and bee products for export to China.
- The MPI Guidance Document China (GACC) Establishment Registration for Food that requires MPI recommendation contains guidance for operators to navigate the processes for requesting MPI recommendation for GACC registrations.

Document history

Version Date	Section Changed	Change(s) Description
1 October 2024	New document	Document format changed from FYI to Guidance document
8 June 2026	All sections	Updated to reflect requirements of GACC's Decree 280, which replaced Decree 248 from 1 June 2026. Simplification of guidance.

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1 Purpose

(1) This document contains general guidance on China's Regulations on the Registration and Management of Overseas Manufacturers of Imported Food (Decree 280).

(2) It is for operators who manufacture (and in some cases, store) food for export to China.

(1) Appendix One outlines the process for requesting MPI recommendation for GACC registration, covering edible fats and oils, milled grain industrial products and malt, food for special dietary use (FSDU), and health food.

(2) Section 10 contains guidance for operators on how to register with GACC for food products that do not require MPI recommendation.

2 Background

(1) China's requirements for registration and management of overseas manufacturers of food imported into China, as outlined in Decree 280, are administered by China's General Administration of Customs (GACC), specifically, the Import Export Food Safety Bureau (IEFSB). GACC is also responsible for interpretating the requirements.

(2) The initial regulations were under Decree 248, which came into effect on 1 January 2022. Decree 280 replaced Decree 248 from 1 June 2026.

3 Definitions

(1) Refer also to Definitions in the China OMAR.

(2) For the purposes of this guidance document:

China OMAR is the China Overseas Market Access Requirement. This is an export requirement specified by the Director-General by notice issued under section 167(1) of the Animal Products Act for the purposes of section 60 of the Act that specifies requirements for animal material or animal product intended for export

China registration number is the same as GACC registration number

CIFER is the China Import Food Enterprise Registration website, an electronic database used by GACC for managing applications for overseas establishment registration

final manufacturing establishment is the establishment that undertakes final packaging of exposed food. This establishment may only pack or bottle the product

FSDU is food for special dietary use and covers soy-based infant and young children formula, formula for special medical use, complementary food for infants and young children, complementary food supplements for infants from 6 months and children up to 5 years of age, pregnancy and lactation supplements, and sports nutrition supplements

GACC is China's General Administration of Customs, also known as China Customs

GACC registration (or GACC establishment registration) is registration of an establishment that manufacturers or stores food products that are intended for export to China, in accordance with the relevant GACC regulations or requirements (mainly Decree 280)

GACC registration number is the number assigned by GACC to an overseas establishment who has successfully registered under Decree 280. Also known as China registration number

HS and CIQ code is a 13-digit code that incorporates a harmonised system (HS) code (10 digits) followed by a CIQ code (3 digits). Used by GACC in CIFER to categorise food products and specify the method of registration that is required

IEFSB is China's Import Export Food Safety Bureau, which is part of China Customs. Their website is here http://jckspj.customs.gov.cn/

MPI is New Zealand's Ministry for Primary Industries

MPI registration number is the identifier for the establishment's risk-based measure (programme/plan/scheme) registered with MPI or Territorial Authority. Examples are Food Control Plan site registration number, National Programme site registration number, Risk Management Programme ID (RMP), Regulated Control Scheme (RCS), Wine Standards Management Plan Registration ID (WSMP). The Unique Location Identifier ID (ULI) for a dairy establishment is used as the MPI registration number instead of the RMP ID number (where different).

SAMR is China's State Administration for Market Regulation. Their website is here https://www.cfe-samr.org.cn/

Verifier means a person or agency recognised under the Animal Products Act or the Food Act to undertake official assurance verification, or an animal product officer appointed under section 78 of the Animal Products Act.

4 GACC establishment registration

(3) Decree 280 requires establishments that manufacture (and in some cases, store) food that is imported into China to be registered with GACC.

(4) Food additives and food-related products are exempt from this requirement.

a) **Food additives** are defined by GACC as 'synthetic or natural substances, including nutritional enhancers, added to food for the purpose of improving food quality, colour, aroma and taste, as well as for preservation purposes or processing purposes (eg processing aid)'.

b) **Food-related products** are defined by GACC as 'generally including packaging materials and containers for food, tools and equipment for food production and operation, and detergents and disinfectants for food'.

(5) GACC registration is required for each type of product that the establishment manufacturers for export to China and the method of registration depends on the product category.

a) Refer to Section 5 of this document for more information on registration methods.

(6) The CIFER (China Imported Food Enterprise Registration) online system manages all registrations under Decree 280. The web address is https://cifer.singlewindow.cn.

a) Refer to Section 9 of this document for more information on CIFER.

(7) Operators should be aware that**:**

a) CIFER is the only official portal for GACC registration, covering new registration, changes, renewals, re-inspection, suspension to resumption.
b) GACC registration is free of charge - GACC does not charge any fees.
c) GACC does not issue registration certificates.
d) GACC does not require submission of an annual review of registration.

(8) Decree 280 includes a labelling requirement.

a) Refer to Section 11.2 of this document for more information on this labelling requirement.

(9) GACC's online filing system requirements for overseas exporters and importing agents of food (as GACC's Announcement No. 105 of 2024 refers) do not overlap with Decree 280.

5 Method of registration application

(1) There are two methods of registration, depending on the product category of the food being imported into China:

a) MPI recommendation required - refer to Section 5.1 below.
b) MPI recommendation not required (registration independent of MPI) - refer to Section 5.2 below.

(2) Reference to product categories is based on how China defines the food.

(3) All applications, irrespective of the method required, are done using the CIFER website.

a) Refer to Section 9 of this document for more information on CIFER.

(4) The CIFER landing page links to Food products and their categories – a search page that shows the product category and registration method based on the HS/CIQ code used to import the food product into China.

a) Refer to Section 6.2 of this document for more information on the HS/CIQ code search function.

(5) A GACC establishment registration is specific to a product category.

c) One establishment can be registered for multiple product categories.
d) Establishments may process multiple products for China where both methods of registration are applicable. For example, an establishment may need to register for honey with an MPI recommendation (product category 'bee products'), and for honey lozenges (product category 'confectionery') without MPI recommendation.

(6) Each establishment and each MPI registration number for that establishment (eg Food Control Plan, National Programme, RMP, RCS, ULI, WSMP) requires a separate CIFER user account, from which the operator applies for each relevant product category, using the appropriate registration method.

a) For example, if a company operates two manufacturing establishments (A and B), and each manufactures both honey lozenges and honey for export to China under an RMP, the company would have a total of two CIFER user accounts and four GACC registrations:

i) CIFER user account for site A: registration A1 for honey lozenges, registration A2 via MPI recommendation for honey; and
ii) CIFER user account for site B: registration B1 for honey lozenges, registration B2 via MPI recommendation for honey.

5.1 Registration where MPI recommendation is required

(1) Applications for the following product categories require MPI recommendation**:**

a) bovine, ovine, caprine and cervine meat (including independent cold stores)
b) casings
c) dairy products
d) dairy-based infant and young children formula products
e) aquatic products (excluding live aquatic animals, including independent cold stores)
f) bee products
g) edible fats and oils
h) milled grain industrial products and malt
i) food for special dietary use (FSDU)
j) health food with SAMR filing or SAMR registration certificates.

5.1.1 How to apply for MPI recommendation

(1) For further information on how to apply for GACC registration via MPI recommendation (whether new, modification, renewal or cancellation):

a) For meat, casings, dairy products (including dairy-based infant and young children formula), aquatic products and bee products, refer to the China OMAR (specifically Schedule 1 of Part 1, plus the individual Part related to the animal product/s in question).
b) For edible fats and oils, milled grain industrial products and malt, FSDU and health food, refer to Appendix 1 of this document.
c) For guidance on these processes, refer to the MPI Guidance Document: China (GACC) Establishment Registration for Food that requires MPI recommendation.
d) Operators should contact MPI at CountryListings@mpi.govt.nz with any questions.

(2) These MPI's processes have been designed to ensure MPI can have confidence to declare to GACC that the establishment being recommended for registration is able to meet the relevant Chinese and New Zealand laws, as well as the requirements of Decree 280.

5.1.2 Product category considerations

(1) **FSDU** covers the product sub-categories. When applying for a new registration for FSDU, each sub-category requires a separate application:

a) soy-based infant and young children formula
b) formula for special medical use
c) complementary food for infants and young children (eg canned baby food or a cereal-based baby food)
d) other (complementary food supplements for infants from 6 months and children up to 5 years of age, pregnancy and lactation supplements, and sports nutrition supplements)

(2) For **formula for special medical use,** operators of establishments should not apply for GACC registration if the product being manufactured at the establishment, and intended for export to China, does not have SAMR product registration. MPI will not be able to recommend such establishments to GACC for modification.

(3) As **dairy-based infant formula** has its own GACC sub-category under dairy products, MPI understands that a dairy-based formula for special medical use would not come under the FSDU category.

(4) For **health food,** operators of establishments should not apply for GACC registration if the product being manufactured at the establishment, and intended for export to China, does not have SAMR filing or registration. MPI will not be able to recommend such establishments to GACC for modification.

(5) The product categories requiring MPI recommendation appear to cover primary food products that have not been processed, or only minimally processed. Foods that may at first appear to fall into one of these product categories, but that have been highly processed, are more likely to fall under the product categories that do not require MPI recommendation.

a) Refer to Section 10 of this document for more information on registration applications that do not require MPI recommendation.
b) Refer to Section 6.2 of this document for more information on how to confirm the product category and registration method.

5.1.3 Market access considerations

(1) New Zealand may not have market access into China for all specific products within the categories listed in 5.1 (1) above.

a) For **bee products**, MPI understands that New Zealand does not have market access into China for 'other bee products' (ie HS and CIQ code 0410902900 104), which appears to cover bee products other than natural honey, pollen, pure royal jelly, pure royal jelly powder, propolis and propolis alcohol extract.
b) For **edible fats and oils,** MPI understands that New Zealand has market access into China and historic/existing trade from New Zealand to China only for **edible vegetable oil**.

c) For **milled grain industrial products and malt,** MPI understands that New Zealand has market access into China and historic/existing trade from New Zealand to China only for **malt.**

(2) MPI recommendation is also required for the following product categories, however New Zealand may not have market access into China (contact TradeandInternationalRelations@mpi.govt.nz for further information):

a) stuffed pastry products
b) rice
c) dehydrated vegetables
d) nuts and seeds
e) dried fruit.

(3) Overseas competent authority recommendation is also required for the following product categories, however New Zealand does not have market access into China:

a) bird's nest and bird's nest products
b) egg and egg products.

5.2 Registration where MPI recommendation is not required

(1) Under Decree No. 280, establishments that manufacture food products for China that do not require MPI recommendation should apply for registration directly with GACC.

(2) This method was previously known as 'self-registration' but the terminology has changed to 'registration independent of MPI' with Decree 280.

(3) For further information about how to apply for registration independent of MPI, refer to Section 10 of this document.

(4) GACC registration independent of MPI is a commercial activity in which MPI is not involved. Exporters and operators are encouraged to seek further advice (where needed) from their importer or agent in China, and/or to engage a relevant consultant.

5.3 Using third parties to help with GACC registration

(1) MPI is aware of independent third-party companies who offer to help overseas companies with GACC registration, including illegitimate registration sites and companies who purport to be from GACC (such as the 'GACC Registration Organisation' or the 'GACC Registration System Department'.

(2) Operators are advised to be wary and verify the source of unsolicited emails (or other forms of communication) before engaging. Although some companies may be officially allowed by GACC to help overseas companies to complete GACC registration, operators should first assess whether they need this help.

(3) Where MPI recommendation is required, if the operator chooses to use an independent third-party company (such as a New Zealand based consultancy) to help with their registration, MPI can only communicate directly with the third-party company once explicit permission is given from the operator.

6 Scope of Decree 280

6.1 General scope clarification

(1) Decree 280 is administered by GACC's Import Export Food Safety Bureau (IEFSB) and so only covers products that they are responsible for.

(2) Decree 280 does not cover edible agricultural products exported to China, such as fresh fruit and vegetables, dried beans, live aquatic animals and deer velvet (ie products administered by GACC's Animal and Plant Quarantine Department (APQD). For more information, refer to:

a) F59/25 China: New Quarantine Establishment Registration Webpage (for Imported Animal and Plant Products) - Update
b) MPI Guidance Document: Registration of Establishments Exporting Horticultural and Plant Products to China' guidance document.

(3) GACC may change the scope of Decree 280 at any time to encompass new product types. Operators should stay in close contact with their importer or agent in China for any indication that their products have been added to the regulation scope (and into the CIFER system).

(4) Decree 280 applies to establishments that produce, process and store food for export to China.

a) Where MPI recommendation is required:

i) Only the final manufacturing establishment requires registration (ie the one that undertakes final packaging of exposed food), except for meat and aquatic products, where establishments along the supply chain may require GACC registration (refer to the China OMAR for more information).
ii) Independent cold stores only require registration if storing meat or aquatic products.

b) Where MPI recommendation is not required (registration independent of MPI):

iii) It is likely only the final manufacturing establishment requires registration.
iv) Operators and exporters should seek advice from their importer and/or agent in China as to whether establishments prior to the final manufacturer or independent stores require registration.

(5) GACC has confirmed the following types of establishments do not need registration:

a) Ambient temperature transit stores that do not process, pack, or repack products.
b) Exporters that are not involved in the manufacture, processing, packing or storage of products.

6.2 Clarifying scope using HS/CIQ codes

(1) GACC provides a search function on the CIFER landing page (Food products and their categories) to help identify whether a specific product requires registration, which product category it comes under, and which registration method is required.

a) This search function can also be accessed by logging onto CIFER and clicking on 'Product category inquiry' in the main left-hand menu.

(2) The search query uses the specific HS/CIQ code of a product (10-digit HS code and 3-digit CIQ code). Operators and exporters should confirm with their importer and/or agent in China which HS/CIQ code each product will be used for import into China.

(3) Users can either:

a) Select a product category and view all relevant HS/CIQ codes that come under that product category, or

b) View the results for a specific HS code (up to 10 digits) or a specific HS/CIQ code (13 digits). If the search comes up blank, GACC advises "If no HS/CIQ code is found for the corresponding product, then your product does not currently require overseas company registration in this system".

(4) If the product requires registration, the search will respond with the following information:

a) Chinese HS code (10 digits)
b) Product name (description related to HS code)
c) CIQ code (Inspection and Quarantine Code - 3 digits)

d) CIQ name (first a repeat of the description related to the HS code, then description related to CIQ code in brackets)
e) Product category
f) Product sub-category
g) Officially recommended registration - 'Yes' means registration requires MPI recommendation; 'No' means registration does not require MPI recommendation.

6.3 Scope guidance for specific food types

(1) **Frozen fruit** and **frozen vegetables** currently require registration under Decree 280 and registration does not require MPI recommendation (refer to Section 10 of this document).

(2) **Frozen blackcurrants** exported from New Zealand to China need to be stored in a registered cold store before export to China.

a) GACC has advised that this specific registration requirement for cold stores is because currently New Zealand frozen blackcurrants are exported to China as bulk fruit for further processing (eg into powdered blackcurrant extract).

7 Type of GACC registration application

7.1 New registration

(1) A 'new registration' application is to register an establishment for the first time for a specific product category.

7.2 Modification of an existing registration

(1) A 'modification' application is to change some information in an existing (approved) GACC registration.

(2) For example:

a) to change the establishment's listed name;
b) to change the establishment's listed address, but only where the physical location remains unchanged;
c) to add a new product to the establishment's registration (for product categories where HS/CIQ codes are listed in the CIFER registration);
d) to add a new process to the establishment's CIFER registration;
e) the establishment has undergone an expansion project where the capacity for product exported to China has increased;
f) to change the establishment's legal representative, but only where this change has not had an impact on the establishment's food safety and hygiene management system (for example, the current legal representative is no longer in that role and has been replaced). Note: If the change has had an impact on the food safety and hygiene management system, a new listing application is expected.

(3) If GACC assesses that a change has had a major impact on the food safety and hygiene management system, they will not approve the modification application and notify the applicant to apply for a new registration. The existing registration number will become invalid from the date of this notification.

a) GACC may perceive the following as having a major impact on the food safety and hygiene management system and expect application for a new listing:

i) Change of legal representative due to change in ownership of the establishment;
ii) Change of establishment address due to change of establishment's physical location (ie change of production site);

iii) Change of establishment's MPI registration number.

b) If there are any doubts as to whether a change will be perceived by GACC as having a major impact on the food safety and hygiene management system, contact TradeandInternationalRelations@mpi.govt.nz for advice.

7.3 Renewal of an existing registration

(1) A 'renewal' application is to extend the registration for another 5 years (ie when a registration is nearing its expiry date).

(2) From 1 June 2026, automatic registration renewal has been introduced for most product categories.

(3) Refer to Section 12 of this document for more information on the renewal requirements.

7.4 Cancellation of an existing registration

(1) A 'cancellation' application is to remove an establishment from the GACC Register (Registration information of overseas manufacturers of imported food).

(2) Once the registration has been cancelled, product manufactured at the establishment (under the specific product category) will no longer be eligible for import into China.

8 Implementation of Decree 280

8.1 Import Eligibility

(1) Overseas establishments with approved GACC registrations are assigned a China registration number, starting with CNZL (also known as GACC registration number).

a) Refer to Section 8.2 of this document for further information about the China registration number.

(2) MPI understands that import declarations for food imported into China, where the food comes under the scope of Decree 280 and is presented to GACC for customs clearance, should include the overseas establishment's China registration number and will not be accepted if the relevant overseas establishment is not registered with GACC.

(3) For food where MPI recommendation is required for registration, only food produced during the 'valid registration period' is eligible for import into China, even when the registration has expired (provided the food is within shelf life). The 'valid registration period' starts when registration is approved in CIFER, or when the modification application to add the specific HS and CIQ code is approved in CIFER. This means that once a registration application has been approved in CIFER, only product produced after the CIFER approval date is eligible for export to China.

(4) For food where registration is independent of MPI, the CIFER registration must be valid at the time of import declaration.

(5) When an establishment is suspended or registration cancelled/revoked, food declared for import before the suspension/cancellation/revocation date remains eligible for import into China.

(6) Exporters are advised that the local port Customs authorities should be approached in the first instance to resolve any issues at the Chinese border related to GACC registration and Decree 280. If the situation cannot be resolved in this manner, exporters should contact tradeandinternationalrelations@mpi.govt.nz for further advice.

(7) Exporters are reminded that Customs clearance at a China port is also subject to other requirements, including China's animal and plant quarantine measures. For plant products, the Importing Country Phytosanitary Requirements (ICPRs) continue to apply.

8.2 China registration number

(1) An establishment's China registration number can be searched for on GACC's 'Registration information of overseas manufacturers of imported food' website.

(2) The format of the China registration number is an 18-digit alphanumeric code (issued by GACC) that identifies the exporting country, the product category and initial date of registration.

(3) For New Zealand establishments, the format is CNZLxxxxyymmddzzzz, where:

a) CNZL is unique to New Zealand establishments
b) xxxx is a 4-digit number indicating product category
c) yymmdd is a 6-digit number indicating initial date of GACC registration
d) zzzz is a 4-digit serial number

(4) For aquatic products, instead of the 4-digit number indicating product category (xxxx), some China registration numbers may show a 2-digit number for product category ('18') followed by the 'type of operation' (eg PP, CS, FF, FV). In some cases the 'type of operation' may not be accurate, but this should not affect Customs clearance.

(5) A single manufacturing establishment may have multiple China registration numbers, one for each product category (or one for each product sub-category when the category is meat or FSDU).

a) In such cases, one of the establishment's China registration numbers may also have been assigned by GACC as the establishment's CIFER username.

(6) A China registration number is specific to a particular establishment (and location of that establishment), and so establishments in different locations cannot share the same China registration number.

8.3 GACC Register

(1) The GACC Register: 'Registration information of overseas manufacturers of imported food' is a public facing website that shows the basic registration information and status of all overseas establishments registered with GACC under Decree 280 (ie for imported food). The web address is https://ciferquery.singlewindow.cn/.

a) This website can be accessed from the CIFER landing website.

(2) Operators and exporters should note that where GACC has suspended an overseas establishment's registration, this is noted on the GACC Register (Registration information of overseas manufacturers of imported food) in the 'State" column. MPI understands that the registration suspension is in force until all references to the suspension are removed from this website.

9 GACC Registration website: CIFER

9.1 General information about CIFER

(1) CIFER stands for China Imported Food Enterprise Registration and the website address is https://cifer.singlewindow.cn.

(2) CIFER is the web platform that GACC uses to manage registrations that come under the scope of Decree 280. Applications for GACC registration can only be done via CIFER.

(3) GACC has provided an English version of the CIFER website. This is accessible by clicking on 'English' at the top right of the CIFER login page.

(4) To login to CIFER, operators need a CIFER user account (ie a username and password). Operators who do not know their CIFER username or password should contact CountryListings@mpi.govt.nz.

(5) Each CIFER user account can only be linked to **one** establishment (ie one physical location) and **one** MPI registration number. This means that operators should have a different CIFER user account for each establishment that is registered (or needs to register) with GACC and for each MPI registration number for that establishment.

(6) CIFER shows the status of the establishment's GACC registrations and registration applications (including those in draft, as well as those submitted to MPI and/or GACC).

(7) GACC has stated that the data in CIFER is confidential and secure, the security of which is managed by individual account usernames and passwords. Operators can only see the information linked to their own CIFER user account/s.

9.2 CIFER User Accounts

(1) A CIFER user account consists of a username and password. CIFER currently requires that passwords have 8-16 capital and lower-case letters, numbers, and symbols.

(2) There are two types of CIFER user accounts:

a) A **certified** CIFER user account has access to all product categories that come under the scope of Decree 280, **including** those that require MPI recommendation.
b) An **uncertified** CIFER user account only has access to product categories that do not require MPI recommendation.

(3) If an establishment's MPI registration number already has a CIFER user account, that account should be used for any new registration applications for that establishment under different product categories.

(4) A new CIFER user account should only be created for an establishment if there isn't already one set up for that establishment's MPI registration number. If in doubt, contact MPI at CountryListings@mpi.govt.nz.

(5) For further information about CIFER User Accounts, refer to Appendix 2.

9.3 Help with CIFER

(1) GACC provides a CIFER user manual for overseas enterprises. This is available on the CIFER landing page: CIFER User Manual.

(2) Operators who are having issues logging into CIFER, or operating within it, should check for firewalls or other security settings in place on their systems that could prevent access to CIFER.

(3) Operators working on an application that need help logging into or navigating CIFER should contact:

a) For registration applications via MPI recommendation, contact MPI at CountryListings@mpi.govt.nz.
b) For registrations independent of MPI, seek further advice from the importer or agent in China, and/or engage a relevant consultant.

10 Applying for GACC registration independent of MPI

(1) This is for product categories where MPI recommendation is not required. This used to be called 'self-registration' but the terminology has changed to 'registration independent of MPI' with the implementation of Decree 280.

10.1 CIFER user accounts

(1) If a CIFER user account doesn't exist for an establishment and it's specific MPI registration number, operators can set up their own.

(2) It is important that the establishment's CIFER user account is set up using the correct MPI registration number. This is the identifier for the risk-based measure whose scope includes the food being manufactured for China and that is registered with MPI (or with a Territorial Authority for some Food Act registrations).

(3) Examples of MPI registration numbers are:

a) Food Control Plan site registration number
b) National Programme site registration number
c) Risk Management Programme ID (RMP)
d) Unique Location Identifier ID (ULI) for dairy establishments
e) Wine Standards Management Plan Registration ID (WSMP).

(4) A New Zealand Business number (NZBN) is not suitable to use as a registration number to set up a CIFER user account.

(5) Refer to Appendix 2 of this document for more information on setting up CIFER user accounts.

10.2 CIFER applications

(1) CIFER applications independent of MPI include eight mandatory 'Enterprise Commitments' that must be ticked to proceed with the application.

a) Enterprise Commitment 2 states that (the enterprise) is "*Approved by and under the effective supervision of the competent food safety authority in the country/region of origin*" and Enterprise Commitment 4 states that "*The production of such food is approved by the competent food safety authority in the country/region of origin with valid certification (corresponding to the uploaded "Production License issued by the competent food safety authority in the country/region of origin*". To meet this, the establishment must be registered with MPI (or Territorial Authority) under either the Food Act or the Animal Products Act.
b) Enterprise Commitment 4 which states that (the enterprise) "Has established an effective food safety, hygiene management, and protection system; legally produces and exports in the country/region of origin; and guarantees that food exported to China complies with relevant Chinese laws, regulations and national food safety standards". To meet this, manufacturers and exporters are expected to work with Chinese importers to understand China's specific food standards, hygiene requirements, and permitted additives/contaminants.

(2) An application requires the operator to enter information or upload attachments into CIFER, which can differ between product categories. Common information requested includes:

a) Establishment information such as name, address, production type
b) Information for a contact person and name of legal representative
c) Other information such as annual production and storage capacity, system certifications, water source, processing methods, numbers of employees and managers.
d) Upload of processing flow chart, product photos, product labels, ingredient list, floor plan, export trade history.

(3) Not all CIFER fields or upload requests are compulsory. Compulsory fields/upload requests are marked with a red asterisk. Operators should make their own decisions on including information that is not compulsory.

(4) One attachment that is compulsory to upload into CIFER is a 'Licensed production certificate issued by the competent authority of the country (region)'.

a) This is a registration document issued by MPI (or for some Food Act registrations, issued by a Territorial Authority)).
b) This registration document should reference the MPI registration number used to set up the CIFER user account.
c) The best document for this purpose is the 'Notice of Registration' issued by MPI (or for some Food Act registrations, by a Territorial Authority) when the risk-based measure was first registered or last updated.

11 Other requirements under Decree 280

11.1 Review of registration applications

(1) Decree 280 states that GACC uses three methods to review applications submitted to them for registration. These methods are listed below and GACC may use more than one type for any specific application:

a) written inspection (ie desktop review)
b) video inspection (ie virtual audit)
c) on-site inspection (ie GACC audit in New Zealand).

(2) GACC may also use the assessment methods in 9.1 (1) to review whether the establishment continues to meet the China requirements during its registration period.

(3) For video inspections or on-site inspections, GACC expects that both the operator undergoing the inspection, and the competent authority of the country where they are located (ie MPI), will provide necessary assistance.

(4) Operators who are advised by GACC that they will be audited (whether by video inspection or on-site inspection) should notify MPI at TradeandInternationalRelations@mpi.govt.nz as soon as possible.

11.2 Labelling

(1) Decree 280 includes a labelling requirement that operators of registered establishments include either the China registration number or the MPI registration number on the packaging of foods exported to China.

(2) MPI understands the purpose of this requirement (and desired outcome by GACC) is to ensure the China Customs officials can readily compare the registration number (ie the CNZL number or MPI registration number) on the customs declaration documents (including on any export health certificate where provided) with that on the physical products themselves (ie product label).

(3) Operators should ensure that any registration number marked on the food's label corresponds to that included in the corresponding import declaration.

(4) Where operators print other types of establishment identifiers on the labels (eg phytosanitary identifiers for vegetable packhouses), MPI recommends that these remain on the labels as well as the MPI registration number or China registration number.

(5) GACC has clarified that when the food exported to China involves multiple registered overseas establishments (for example, a final manufacturing facility and an independent cold store, or a manufacturing facility and an establishment that packs the final product), the operators involved may choose which establishment's registration number (ie China registration number or MPI registration number) is included on the labels, or they may choose to print both establishments' registration numbers.

11.3 Changes to establishment location, legal representative, or MPI registration number

11.3.1 Where a new registration is required

(1) Under Decree 280, if one of the changes listed below is submitted as a modification application and GACC assesses that the change has had a major impact on the food safety, hygiene management and protection system, they will not approve the modification and will notify the applicant to apply for a new registration. The existing registration number will become invalid from the date of this GACC notification:

a) Change of legal representative due to change in establishment ownership
b) Change of establishment address due to relocation of production site (ie change of physical location)
c) Change of establishment's MPI registration number.

(2) If there are any doubts as to whether a change will be perceived by GACC as having a major impact on the food safety, hygiene management and protection system, it is strongly recommended to contact TradeandInternationalRelations@mpi.govt.nz for advice.

(3) If GACC requires a new registration to make such changes to an existing registration, this cannot be done in CIFER until the existing registration (for the same product category) is first cancelled.

a) This means that the operator and exporter should plan for a period where product (from that establishment and under the relevant product category) will not be able to be manufactured/processed (and in some cases, stored) by the establishment for export to China or be exported to China.
b) This period is between when GACC has approved the cancellation application and when GACC approves the new registration application.

(4) Operators considering one of the changes in 11.3.1 (1) where MPI recommendation is required should contact MPI at CountryListings@mpi.govt.nz to discuss.

11.3.2 Address of establishment

(1) If the establishment's registered address changes but the physical location remains unchanged (eg the council changes the street name), the operator can apply for a registration modification.

(2) GACC has previously clarified that if the head office (ie the location of the management personnel) changes, this is not considered to be the relocation of the production site.

11.3.3 Legal Representative

(1) Operators can choose who to assign as the establishment's legal representative for each of their GACC registrations in CIFER.

(2) MPI understands that the legal representative is a person representing the establishment who is responsible for the food safety of the products manufactured/processed or stored at the establishment and exported to China. This should be a person located in New Zealand.

11.3.4 MPI registration number

(1) Operators of establishments registered under the New Zealand Food Act will be aware that their Food Act registration needs to be renewed annually via the relevant New Zealand registration authority. Operators are cautioned to ensure this renewal is always completed on time so that the Site Registration Number (which is used as the 'MPI registration number' for GACC registration) does not change, as this would result in the operator having to re-apply for new GACC registration.

12 Renewal of registration

(1) GACC uses different terms in different areas for registration 'renewal', including 'extension' or 'continuation'. These terms all have the same meaning.

(2) GACC establishment registrations are valid for 5 years. The expiry date of each establishment registered with GACC is shown on GACC's 'Registration information of overseas manufacturers of imported food' website, as well as in CIFER.

(3) From 1 June 2026:

a) Only registrations for meat and meat products will require renewal applications every 5 years.
b) For other product categories, regardless of application method, GACC registration will automatically renew at the expiry date, unless:

i) the establishment is under-going rectification with GACC due to non-compliance at the time of expiry (ie the registration for that particular establishment will not auto-renew), or
ii) GACC has suspended (country-wide) imports of the specific product category from New Zealand to China (ie no registrations for the specific product category will auto-renew).

(4) Where renewal application is required:

a) Application needs to be done via CIFER using the same registration method as was used for the initial registration (ie based on product category, either via MPI recommendation or not).
b) Application can only be done in CIFER between 3 and 12 months before the registration expiry date.

(5) If a renewal application is required but not completed, GACC is likely to cancel the registration after expiry. Once a registration has been cancelled, the China registration number is no longer valid and product from that establishment (and under that product category) is no longer eligible for import into China.

(6) Changes to registration information in CIFER cannot be made via renewal application. Changes to information can only be done via modification application.

Contact for further information

Ministry for Primary Industries (MPI)
Policy and Trade Branch
Bilateral Relations and Trade Division
PO Box 2526
Wellington 6140
Email: TradeandInternationalRelations@mpi.govt.nz

Disclaimer

This "For Your Information" 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.

Appendix One: Process to apply for GACC registration via MPI recommendation - for food products not covered by China OMAR

General Information

(1) This section applies to establishments that manufacture the following product categories for export to China:

a) edible fats and oils;
b) milled grain industrial products and malt;
c) FSDU;
d) health food with SAMR filing or SAMR registration certificates.

(2) This section outlines the process to apply for MPI recommendation for new, modification, renewal and cancellation applications for the products listed in (1) above.

(3) Before reading this appendix, operators should first become familiar with the rest of this document, in particular Section 5.1 (Registration where MPI Recommendation is required).

(4) The process consists of the following four steps. Each of these steps is described in more detail further below:

a) Step 1: Operator self-assessment
b) Step 2: Verification (by MPI-recognised agency, using desktop review and onsite audit)
c) Step 3: Request for MPI recommendation (via email)
d) Step 4: Application in CIFER

(5) For detailed guidance on how to follow this process, refer to the MPI Guidance Document: China (GACC) Establishment Registration for Food that requires MPI recommendation.

(6) Any questions should be sent to MPI at CountryListings@mpi.govt.nz.

Process to apply for MPI recommendation (new, modification and renewal)

Step 1 (Operator Self-assessment)

(1) To start an application for new registration, modification of an existing registration, or renewal of an existing registration:

a) For **all** applications: Complete an operator self-assessment against the relevant China Registration Conditions and have declared all applicable conformity determinations as 'conforming';
b) For **all** applications: Ensure that all relevant supporting materials that the operator has used to prove conformity to the China Registration Conditions are readily available to MPI or GACC at any time (on request);
c) For **new** and **modification** applications only: complete the relevant China Application Form and prepare all applicable attachments as required within the Application form;
d) For **modification** applications only: complete the Modification request summary to summarise what changes are being applied for.

Step 2 (Verification)

(1) Once Step 1 is completed, send the following documents to the verifier:

a) For **all** applications: A completed operator self-assessment against the China Registration Conditions relevant to specific product/s, as well as associated supporting materials;

b) For **new** and **modification** applications only: a completed China Application Form relevant to specific product/s, as well as applicable attachments required within the Application Form;
c) For **modification** applications only: completed Modification request summary that summarises what changes are being applied for.

(2) On receiving the application, the verifier should assess whether the establishment can meet GACC's registration requirements by verifying and signing the following documents, and sending them back to the operator:

a) For **all** applications: The completed operator self-assessment against the China Registration Conditions, as well as verifying the associated supporting materials;
b) For **new** and **modification** applications only: the completed China Application form, as well as verifying the applicable attachments required within the Application form

(3) Verification to confirm that the establishment meets GACC's registration requirements (and to sign the forms) should involve:

a) a documentary review (for all types of application)
b) an onsite audit (as well as a documentary review) only for the following application types:

i) new registration
ii) modification due to the establishment having undergone expansion or renovation where the production capacity has increased
iii) renewal (when needed)

(4) The verifier's role is to verify, on behalf of MPI, that the operator's application materials are true and complete and that they reflect the 'actual situation' at the establishment. This enables MPI to recommend the establishment for GACC registration with confidence.

a) By signing the relevant China Application form, the verifier confirms that they have no reason to doubt that the information in the Application form (including relevant attachments) has been completed where required and reflects the actual situation.
b) By signing the relevant China Registration Conditions document, the verifier confirms that they have no reason to doubt that the operator has undertaken a self-assessment against the Registration Conditions and has adequately assessed these as 'conforming', where applicable.

Step 3 (Request for MPI recommendation)

(1) Following Step 2, to request an MPI recommendation to GACC, send the following documents to MPI at CountryListings@mpi.govt.nz and copy in the verifier:

a) For **all** applications: The completed operator self-assessment against the China Registration Conditions relevant to specific product/s, signed by the verifier;
b) For **new** and **modification** applications only: the completed China Application form relevant to specific product/s, signed by the verifier;
c) For **new** and **modification** applications only: attachments specified as required within the China Application form (where applicable);
d) For **modification** applications only: completed Modification request summary that summarises what changes are being applied for.

(2) The supporting documents associated with the China Registration Conditions do not need to be sent to MPI.

Step 4 (Application in CIFER)

(1) Step 4 (Application in CIFER) can be done once Step 3 has been completed, which is once MPI has no further comments on the operator's request for recommendation and informs the operator by email that they can move to Step 4.

(2) To ensure the application in CIFER is submitted to MPI and not submitted directly to GACC, select the application registration method 'Standard Application Route (via Competent Authority Recommendation)' in CIFER.

(3) Enter the information (including uploading the required attachments) from the verified Application form into CIFER and then submit the application to MPI.

Process to cancel GACC registration via MPI recommendation

(1) To cancel a GACC registration for product categories where MPI recommendation is required, send the following documents to MPI at CountryListings@mpi.govt.nz and copy in their verifier:

a) a brief reason for cancellation; and
b) a completed version of the Cancellation Declaration of the Manufacturer, signed by a company representative.

(2) The Cancellation Declaration of the Manufacturer should be:

a) signed by someone authorised to sign for the company (but does not have to be the legal representative declared in CIFER)
b) by signing the Cancellation Declaration of the Manufacturer, the company representative confirms that the food produced by this enterprise (related to the specific product category for which the cancellation application is for) will no longer be exported to China.

(3) Once the cancellation has been approved by GACC in CIFER, the establishment's GACC registration for that product category is cancelled and the specific China Registration Number (starting with CNZL) is no longer valid. This will show as 'log out' on the GACC Register (Registration information of overseas manufacturers of imported food).

(4) Once the registration is cancelled, product from this establishment under that specific product category is no longer eligible for import into China.

Appendix Two: CIFER User Accounts

Setting up an uncertified CIFER user accounts

(1) Any user can set up a CIFER user account for their establishment and MPI registration number, but this will automatically be an **uncertified** account.

(2) Before setting up a new CIFER user account, first check whether the establishment and MPI registration number already has one. If in doubt, please check with MPI at CountryListings@mpi.govt.nz.

(3) Select 'Create an account' on the CIFER login page. Choose a username and password and complete the rest of the fields. Your email address will be verified using a verification code.

(4) Once the account is set up, add the establishment's MPI registration number (called 'Located Country(Region)Register Number'). Once entered, this will link with the user account and so is important to get right first time.

a) Refer to the Definitions section of this document for an explanation of what the MPI registration number is.
b) If using RMP, the suffix (for example '/01' or '/02') should be removed.
c) If using Food Control Plan site registration number or the National Programme site registration number, the suffix (for example '/1' or '/2') should be included.
d) Do not use a NZ Business Number (NZBN)
e) If a CIFER user account is set up with the incorrect MPI registration number, this cannot be changed and a new separate CIFER user account will need to be set up to correct this.

(5) A CIFER user account is separate to a GACC registration application, but you cannot so the latter without the former.

(6) MPI is unable to reset CIFER passwords for uncertified CIFER user accounts.

Certified CIFER user accounts

(1) For product categories that require MPI recommendation, a **certified** CIFER user account is required.

(2) If the establishment and MPI registration number doesn't already have a certified user account, either:

a) Ask MPI to certify the account (see below), or
b) Set up an uncertified account by following the steps above and then ask MPI to certify the account (see below), or
c) Ask MPI to set up a CIFER user account by providing the following information to MPI at CountryListings@mpi.govt.nz:

i) A preferred username (this can be a combination of letters and numbers with no gaps, but should not be more than 14 characters)
ii) The establishment's MPI registration number
iii) Name and address of the establishment (that matches exactly the details in the relevant MPI register)
iv) Contact details for the operator including name, email address and phone number

(3) MPI can look up the username and reset CIFER passwords for certified CIFER user accounts – contact MPI at CountryListings@mpi.govt.nz..

How to certify a CIFER user account

(1) Only MPI can certify a CIFER user account, changing it from **uncertified** to **certified**. Applying to MPI to certify an account is not the same as applying for GACC registration.

(2) If the establishment and MPI registration number has an uncertified CIFER user account, operators should ask MPI to certify this account. This can be done by either using the 'Account Certification' menu item in CIFER, or by emailing MPI at CountryListings@mpi.govt.nz with the account username and MPI registration number.

(3) MPI will not certify a CIFER account where:

a) the 'Registration number approved by the local Competent Authority' in CIFER (ie the MPI registration number) is incorrect. In these cases, a new CIFER user account will need to be set up for that establishment using the correct MPI registration number.
b) the establishment name and address used for the CIFER user account do not match those in the relevant (public) MPI register.
c) The food product scope linked to the MPI registration number does not include a product category where GACC requires MPI recommendation.

(4) If MPI needs further information or cannot approve the certification request for any reason, this will be communicated to the operator (either via CIFER or by email, depending how the original account certification request was sent into MPI).