



China requirements for solid beverages (powdered products for drinking)

15 August 2024

Title

Guidance Document: China requirements for solid beverages (powdered products for drinking)

About this document

This guidance document contains publicly available information on China's requirements for solid beverages products. The document references China's current regulations, announcements and suggested draft updates to China's solid beverage standard available at the time of publication. The information provided in this guidance is not exhaustive and subject to change as requirements are updated. Manufacturers and exporters should clarify requirements with their importers and/or agents in China and keep informed of any changes to China's requirements.

Document history

Version Date	Section Changed	Change(s) Description
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1 Purpose

- (1) The purpose of this guidance is to make exporters and manufacturers aware of China's requirements for 'solid beverages' that are in pre-packaged and retail-ready forms. China considers solid beverages to be processed powders or granular solid form products intended to be made into a beverage for drinking after dissolving or brewing.
- (2) This guidance cancels and replaces both F29/21: Proposed new label requirements for solid beverage products exported to China and F01/22: New label requirements for solid beverage products exported to China, to provide general information on the requirements for solid beverages.

2 Background

- (1) China has released several documents outlining expectations and potential changes to the regulation of solid beverage products. MPI understands the intent of the changes is to strengthen controls over solid beverages in response to a solid beverage product being misrepresented as infant formula for special medical purposes.
- (2) On 7 January 2022, State Administration for Market Regulation (SAMR) issued the "*Announcement on Strengthening the Quality and Safety Supervision of Solid Beverages*" to "further standardize the labelling of solid beverages, strictly supervise their quality and safety, and more effectively protect consumers." The requirements in this announcement came into force for products manufactured from 31 December 2022.
- (3) On 26 July 2023, China Beverage Industry Association released a draft Chinese national food safety standard (i.e. GB standard) titled *GB/T 29602 Quality Requirements for Solid Beverage*, proposing to replace the current standard *GB/T 29602-2013 Solid Beverages*. The intent of the draft is to protect consumers and avoid the misapplication of the solid beverage standard. The available draft suggests changes to definitions, product categories, technical requirements, labelling and packaging. However, the final proposed draft is not yet publicly available.
- (4) MPI reminds exporters and manufacturers that SAMR is responsible for approval and supervision of the following special foods:
 - a) infant formula products (including follow up formula) and formulated supplementary foods for young children (ie infant and young children formula)
 - b) foods for special medical purpose products and
 - c) health foods including dietary supplements and functional health foods.
- (5) MPI is aware that solid beverages are widely consumed in China and can include protein solid beverages, plant-based solid beverages, special-purpose solid beverages, flavoured solid beverages, and solid beverages that contain active bacteria (i.e. probiotics).

3 General Requirements

- (1) Exporters and manufacturers should ensure that labels and promotional materials associated with solid beverage products do not mislead consumers to purchase solid beverages as special foods, such as infant and young children products, health foods or foods for special medical purposes. As China's controls over solid beverages have been under development for several years, it is important that exporters clarify requirements with their importers and/or agents in China and keep informed about any changes to requirements.

3.1 Proposed changes to GB/T 29602 Solid Beverages

- (1) China's current National Food Safety Standard *GB/T 29602-2013 Solid Beverages* defines solid beverages as solid products that are prepared by processing raw food materials and food additives into a powder, granule, or block form, and served by dissolving or brewing.
- (2) The definition proposed in the draft standard *GB/T 29602 Quality Requirements for Solid Beverage* clarifies that solid beverages involve processed powders or granular solid form products that are intended for drinking after dissolving or brewing. These powders or granules are derived from one or more edible raw materials (and potentially food additives). The draft suggests the removal of 'block form' from the definition.
- (3) The current standard *GB/T 29602-2013 Solid Beverages* covers a number of categories, including powdered flavoured beverage, powdered fruit/vegetable beverage, powdered protein beverage, powdered milk beverage, powdered tea beverage, powdered coffee beverage, powdered botanical beverage, powdered beverage for special use and other powdered beverage.
- (4) The GB standard *GB 7101-2003 Hygienic Standard for Solid Drink* lists solid beverages as either protein-type solid beverages (those with a protein content of at least 4%) or ordinary solid beverages (those with a protein content less than 4%).
- (5) MPI understands that the proposed draft standard *GB/T 29602 Quality Requirements for Solid Beverage* will add two new categories (i.e. 'vegetable fat powder' and 'powdered lactic acid bacteria beverage'), and will remove two categories (i.e. 'powdered milk beverage' and 'powdered beverages for special use' to avoid solid beverage products being mistaken for 'infant formula' or 'food for special medical use').
 - a) 'powdered milk beverage' products are likely to be classified as 'modified milk powder' (under dairy products) which has stricter import controls (ie New Zealand dairy products exported to China must be certified on the MPI AP E-cert template CN600 and the final manufacturer in New Zealand must be registered with the General Administration of China customs (GACC) and included on the [MPI List for China: Dairy products \(except infant formula\) manufacturing establishments](#)).
 - b) 'powdered beverages for special use' products are likely to be classified as 'foods for special dietary use' ('FSDU') which has stricter import controls (i.e. the final New Zealand manufacturer of FSDU products intended for export to China must be registered with GACC via MPI recommendation), and those FSDU products defined under the sub-category 'food for special medical use' also require product registration with SAMR.
- (6) In the proposed draft standard, powdered protein beverages that include hydrolysed proteins, other than collagen, would no longer be considered 'solid beverages'. The draft standard proposes that hydrolysed protein products would fall under another classification, such as 'dairy products' or 'foods for special medical use'.

3.2 GACC Registration

- (1) China's "*Regulations of the People's Republic of China on the Registration and Administration of Imported Food Overseas Production Enterprises*" (Decree No. 248) requires establishments that manufacture solid beverage products to be registered with GACC. For solid beverages intended for export to China, the method of registration is directly with GACC (i.e. self-registration) through the CIFER system. Refer to [F36/23: China Registration of Food Establishments](#) for more information. As self-registration is a commercial process, MPI can assume no responsibility for any errors or misinterpretations within the guidance document or any guidance given to operators regarding self-registration.