



*Ministero della Salute*  
**DIPARTIMENTO DELLA SALUTE UMANA, DELLA  
SALUTE ANIMALE E DELL'ECOSISTEMA  
(ONE HEALTH) E DEI RAPPORTI INTERNAZIONALI**  
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**Associazioni di categoria  
(Settore alimenti)**

**Oggetto: EXPORT CINA - trasmissione dell'Announcement n. 27/2026 recante alcune disposizioni attuative del Decreto GACC n. 280**

Si fa seguito alla nota DGISAN prot. n. 23871 del 15.05.2026 e si trasmette l'*Announcement n. 27* del 2026, con il quale il GACC ha reso note alcune disposizione operative inerenti al Decreto n. 280. Se ne rimette in allegato una traduzione di cortesia messa a disposizione dalla delegazione UE in loco. Nel rimandare al documento in questione per tutti gli opportuni approfondimenti, si richiamano di seguito alcuni punti di interesse.

Con l'*Announcement n. 27* il GACC definisce in particolare:

- l'elenco delle categorie di prodotti per la cui registrazione è necessaria la

- “raccomandazione” dell’AC (in applicazione dell’Art. 6 del Decreto n. 280);
- l’elenco delle categorie di prodotti che non sottostanno al rinnovo automatico dell’autorizzazione (in applicazione dell’Art. 21 del Decreto n. 280);
- le tipologie di impianti di stoccaggio di cui all’Art. 30 del Decreto n. 280 che sono oggetto di registrazione.

Relativamente a questo ultimo punto, si coglie l’occasione per sottolineare una precisazione rispetto a quanto anticipato nella nota sopra richiamata (dove si indicava che sono soggette a registrazione le imprese che effettuano attività di stoccaggio in generale di alimenti a regime di temperatura controllata e che stoccano prodotti dell’acquacoltura); con l’Announcement n. 27 del GACC viene specificato nel dettaglio che le tipologie di depositi frigoriferi soggetti a registrazione sono quelle che effettuano attività di stoccaggio, a temperatura controllata, di alimenti di origine animale e di prodotti acquatici. Coerentemente con le classificazioni doganali cinesi, si utilizza la dicitura “prodotti acquatici” per sottolineare un’accezione più ampia rispetto alla nozione europea di “prodotti ittici”: per la normativa cinese, infatti, tale categoria comprende anche invertebrati edibili quali echinodermi (es. cetrioli e ricci di mare) e cnidari (es. meduse). Si evidenzia, inoltre, che nella categoria dei “prodotti acquatici” risultano ricomprese anche alcune tipologie di alghe edibili (HS 1212 21).

L’*Announcement n. 27* fornisce inoltre indicazioni operative per quanto riguarda:

- alcuni obblighi di dichiarazione per l’importazione di alimenti relativi alla registrazione;
- alcune indicazioni relative alla gestione del sistema Cifer e alla relativa consultazione da parte degli Operatori;
- indicazioni sul catalogo dei prodotti agricoli primari soggetti alla registrazione.

Al fine di diffondere strumenti utili di informazione, si allega in ultimo il report messo a disposizione dalla DG TRADE ed elaborato dall’EU SME in esito ad un evento formativo che ha visto la partecipazione e l’interlocuzione del GACC; stante alle richieste di chiarimento in questo contenute, il GACC avrebbe confermato che i depositi frigoriferi per prodotti lattiero caseari sono esclusi dall’obbligo di registrazione. Si invita come sempre a vigilare con attenzione sulle procedure e a segnalare tempestivamente a questo Ufficio qualsiasi eventuale criticità o anomalia riscontrata.

Si invitano i Servizi Veterinari e le Associazioni di categoria in indirizzo a voler dare massima diffusione della comunicazione a tutti gli operatori interessati.

Allegati:

- Announcement n. 27/2026 (trad. EN di cortesia)
- GACC Decree 280 and CIFER System Training: 2026 Session Meeting Minutes

IL DIRETTORE DELL'UFFICIO 9 DGISA

Dott. Nicola SANTINI

Firmato digitalmente da

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## **General Administration of Customs Announcement No. 27 of 2026 (Announcement on Relevant Matters Concerning the Implementation of the "Regulations on the Registration Management of Overseas Production Enterprises of Imported Food of the People's Republic of China")**

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The "Regulations on the Registration Management of Overseas Production Enterprises of Imported Food of the People's Republic of China" (General Administration of Customs Order No. 280, hereinafter referred to as the "Registration Regulations") was promulgated on October 14, 2025, and will come into effect on June 1, 2026. The relevant implementation matters are hereby announced as follows:

### **I. List of Supporting Catalogs for the "Registration Regulations"**

Based on the analysis of factors such as the source of raw materials, production and processing technology, historical food safety data, consumer groups, and consumption methods of food, and in conjunction with international practices, the General Administration of Customs has determined the catalog of imported foods requiring official recommendation for registration, the list of foods whose registration will not be automatically renewed, and the scope of overseas storage enterprises for imported foods that need to be registered in accordance with the "Registration Regulations." The relevant catalogs, lists, and scopes are subject to dynamic management.

#### **(I) List of Imported Foods Requiring Official Recommendation for Registration.**

According to Article 6 of the Registration Regulations, the list of imported foods requiring official recommendation for registration includes: meat and meat products, sausage casings, bird's nest and bird's nest products, bee products, eggs and egg products, edible oils, stuffed pasta, edible grains, grain flour and malt, dehydrated vegetables, seasoning powders, nuts and seeds, dried fruits, special dietary foods, health foods, dairy products, and aquatic products.

#### **(II) List of Foods Not Eligible for Automatic Renewal of Registration.**

According to Article 21 of the Registration Regulations, the list of foods not eligible for automatic renewal of registration includes: meat and meat products, and bird's nest and bird's nest products.

#### **(III) Scope of Overseas Storage Enterprises for Imported Foods Subject to Registration Management in Accordance with the Registration Regulations.**

According to Article 30, Paragraph 1 of the Registration Regulations, the scope of overseas storage enterprises for imported foods subject to registration management in accordance with the Registration Regulations includes: cold storage facilities used for storing terrestrial animal-derived foods and aquatic products.

## II. Import Food Declaration Requirements Related to Registration

### (I) Information Filing Requirements

For imported food products destined for human consumption or as raw materials for food processing, the registration number of the overseas manufacturer in China corresponding to the "Country (Region) of Origin" should be accurately filled in the "Registration Certificate of Overseas Manufacturer for Imported Food" column (license category code "519") under the "Product Qualification" section of the customs declaration form; and "for consumption" should be accurately filled in the "Purpose" column under the "Commodity Declaration" section of the customs declaration form.

Customs will not accept declarations that are not filled in according to the requirements. Customs will investigate and punish any false information submitted to obtain customs documents in accordance with the law.

### (II) Import Food Declaration Requirements

For overseas food production enterprises requiring official registration recommendation, products manufactured within the registration validity period can be declared for import (including food produced within the registration validity period and within its shelf life by enterprises whose registration validity period has expired and has not been renewed). For overseas food production enterprises that register on their own, the enterprise registration must be valid at the time of import declaration. For overseas food production enterprises that have been suspended, deregistered, or revoked, food shipped before the date of suspension, deregistration, or revocation will not be affected in the import declaration.

If the General Administration of Customs has special requirements, those requirements shall apply.

## III. Registration Processing and Information Inquiry Channels

### (I) Registration Management System for Overseas Food Production Enterprises.

To facilitate the implementation of the "Registration Regulations," streamline enterprise registration applications, and improve efficiency, overseas food production enterprises can use the General Administration of Customs' Registration Management System for Overseas Food Production Enterprises (hereinafter referred to as the Registration System) to inquire about and process applications, changes, renewals, suspensions, and reinstatements. The access address for the Registration System is: <https://cifer.singlewindow.cn>. The General Administration of Customs reminds relevant enterprises to be vigilant and avoid logging into fake websites to prevent losses. (II) Information Inquiry Channels.

During the registration process for overseas manufacturers of imported food, the company can check the progress of its registration application, as well as the review opinions and feedback from the General Administration of Customs, through the registration system.

The registration number and validity period of registered overseas manufacturers of imported food can be found through the "List of Registered Overseas Manufacturers of Imported Food" function on the official website of the General Administration of Customs or the registration system.

Materials such as the registration guide for overseas manufacturers of imported food, the user manual for the registration system, and the hotline for registration-related inquiries can be found through the "Guide" function of the registration system, or by referring to the guide published on the website of the General Administration of Customs.

The product categories and corresponding customs commodity codes and regulatory identification codes involved in the registration of overseas manufacturers of imported food can be found through the "Product Category Inquiry" function of the registration system.

#### IV. Other Instructions

(I) The catalogue of imported primary edible agricultural products requiring overseas enterprise registration, import declaration requirements, and inquiry methods shall be implemented in accordance with Announcement No. 219 of 2025 issued by the General Administration of Customs. (II) The General Administration of Customs will not charge any fees for the registration of overseas enterprises importing food and primary agricultural products.

This is hereby announced.

General Administration of Customs

March 18, 2026



## **GACC Decree 280 and CIFER System Training: 2026 Session Meeting Minutes**

Meeting held on 26 March 2026, onsite in Beijing and online

The purpose of the meeting was to help the EU side better understand the background behind Decree 280's revision, the regulatory reasoning, the key changes in the provisions, how implementation will work, and how the CIFER system will operate both before and after the new rules take effect. The meeting also provided the participants with an opportunity to ask questions directly to GACC representatives.

GACC representatives:

- Mr. Pu Hongjun, Section Chief, Department of Import and Export Food Safety, GACC
- Ms. Hu Ning, Registration Project Leader, China E-Port Data Center, GACC
- Jia Yingyi, China Customs Science and Technology Research Center, GACC
- Song Lili, Import and Export Food Safety Bureau, GACC
- Song Xiaoyan, International Inspection and Quarantine Standards and Technical Regulations Research Center, GACC
- Zou Wanying, China Customs Science and Technology Research Center, GACC

EU side:

Representatives from the EU Delegation to China, EU Member State diplomatic missions and competent authorities



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## Part 1. GACC Decree 280 interpretation by Mr. Pu Hongjun

### Chapter One: Background to the revision

China is a major market for food consumption and food imports globally, and the volume of imported food trade keeps growing. At the same time, global food supply chains are becoming increasingly complex, food safety incidents still occur, and cross-border food supervision requires stronger front-end identification and whole-process risk control. Against this backdrop, the registration regime for overseas producers has become one of the key instruments in China's imported food safety management system.

**Historical evolution:** GACC noted that the registration regime for overseas producers didn't start with Decree 248. As early as 2002, the former AQSIQ had already issued relevant rules on the registration and administration of overseas producers of imported food. The system has continued to evolve in practice ever since. After Decree 248 entered into force on 1 January 2022, full registration coverage was achieved for all overseas producers of imported food exported to China. Decree 280 was issued on 14 October 2025, and on 18 March 2026 GACC issued Announcement No. 27 to provide further clarification on certain implementation matters and to publish the supporting directories and lists.

### Principles and objectives of the revision

Decree 280 is based on five principles:

- First, it strengthens risk management, making registration management more scientific and precise.
- Second, it reinforces full-chain control, strengthening source management (traceability) for imported food.
- Third, it continues to adhere to the principle of Safety First while further improving the registration management system.
- Fourth, it enhances international co-governance, promoting cooperation with overseas competent authorities.



- Fifth, it optimises administrative procedures without lowering regulatory requirements.

The registration regime is seen as the front-end part of the whole-chain supervision of imported food, and the new rules aim to strengthen communication and cooperation with the competent authorities of exporting countries to more effectively discharge shared regulatory responsibilities.

## **Chapter Two: Main institutional changes introduced by Decree 280**

### **Article 5: Determination of registration system - emphasis on system assessment without making it a universal precondition**

Part of the content relating to registration conditions for producers under Decree 248 has been incorporated into the general principles of the new rules. The new rules give greater prominence to the system assessment while making clear that such assessment is not a universal precondition applicable in the same manner to all products and all countries or regions.

Whether a system assessment is carried out will serve as an important reference for GACC when adjusting management measures and supervision methods, but the absence of such assessment does not in itself mean that the enterprises concerned cannot obtain registration. This adjustment is helping to alleviate earlier concerns on the foreign side that registration would be impossible if a system assessment had not been completed.

### **Article 6: Catalogue of products requiring official recommendation - moving from a fixed list to dynamic management**

This is one of the provisions that has changed more significantly in this revision. Under Decree 248, the categories of food requiring recommendation by the competent authority for registration were listed one by one in the body of the regulation.

Under Decree 280, this approach is replaced by a dynamic Directory management mechanism (Catalogue). Based on risk assessment and scientific evaluation, GACC will adjust the Catalogue of foods requiring official recommendation for registration and publish it by announcement.



Some products that previously required official recommendation have now been removed from the Catalogue. These include oilseeds, fresh-preserved vegetables, dried beans, seasonings and unroasted coffee beans etc. The Catalogue has already been published together with Announcement No. 27 and that, should the Catalogue be updated in future, GACC will publish such updates accordingly.

#### **Article 8 and related provisions: Registration conditions and procedures - more flexible submission**

For products requiring recommendation by the competent authority, Decree 248 foresees that the enterprise first prepares the materials and submits them to the competent authority, which would review the application and forward it to GACC ('traditional path'). After Decree 280 enter into force, this traditional route will remain available, but enterprises will also have another option ('new direct path'): first obtaining from the competent authority a recommendation letter and a supervision and inspection report within the existing local regulatory framework, then submitting the application directly to GACC through the system. For products that do not require official recommendation, enterprises may continue to submit directly.

Once materials have been submitted, GACC will conduct its review in accordance with the applicable requirements and may, depending on the circumstances, use different methods such as documentary review, expert assessment, remote video inspection, or on-site inspection before deciding whether to approve registration. The enterprises will be able to choose the most appropriate and convenient route depending on the product category concerned and the applicable rules.

#### **Article 10: Application information - Further categorisation and simplification of registration materials**

The application materials under Decree 280 have been grouped into five types:

- First, the basic registration application information.



- Second, documents proving the identity or legal status of the enterprise, such as a business license or another lawful identity document issued by the competent authority in accordance with domestic law.
- Third, the declaration by the enterprise that its production activities comply with Chinese requirements.
- Fourth, for products requiring official recommendation, the inspection report and recommendation letter issued by the competent authority.
- Fifth, any supplementary materials required for specific product categories.

### **Chapter Three: Article 17 - List registration as a new facilitation mechanism**

GACC stated that list registration is one of the important reforms under Decree 280. In addition to the traditional route whereby enterprises apply one by one and GACC reviews and approves each case individually, China may, based on mutual trust and cooperation with the competent authorities of the relevant countries or regions, establish through consultations and bilateral arrangements a mechanism under which enterprise registration information is submitted in batches by a pre-agreed list.

By way of example, GACC noted that where China and a partner authority have reached relevant arrangements, the competent authority of that country or region may submit to China, in one package, a list of enterprises for a given product or set of products, so that China may complete the relevant registration work more efficiently. GACC stressed that this facilitation mechanism is based on trust and cooperation and does not replace the standard process — the two mechanisms are complementary and may coexist.

### **Article 18: Changes - broader modification mechanism**

GACC stated that Decree 280 introduces important changes to the rules on permitted changes to information given during the registration. Under Decree 248, certain changes are treated as non-modifiable, meaning that enterprises would in practice need to cancel and re-register if those changes occurred.



Under Decree 280 the scope for applying for changes to registration information is expanded. If the enterprise's information changes, the enterprise may in principle apply to GACC for a modification. GACC will then assess the nature of the change: if the change has a material impact on food safety, GACC may require the enterprise to re-register; if the impact is limited, GACC may allow a modification.

#### **Article 20: Renewal - optimisation of renewal arrangements and introduction of automatic renewal**

Under Decree 248, registration was valid for five years and enterprises were required to apply proactively for renewal before expiry. Decree 280 – as a major facilitation - introduces the List of Imported Foods Not Eligible for Automatic Renewal. For enterprises not included in that list and meeting the relevant conditions, registration may be renewed automatically upon expiry, without any further application by the enterprise or the competent authority. The List has been published together with GACC Announcement No. 27 of 2026.

For those categories that still require enterprises to apply proactively for renewal, the application window has been extended from 3-6 months before expiry to 3 to 12 months before expiry, giving enterprises a more adequate preparation period.

#### **Article 24: Suspension and Resumption - more explicit rules on suspension, rectification and restoration**

Decree 280 further refines the rules on suspension, rectification, and restoration if problems arise at an enterprise. Enterprises discovering problems should promptly take risk control and mitigation measures and report the issue and the measures taken to GACC. Compared with Decree 248, Decree 280 makes clear that rectification reports must be submitted via the competent authority, whether the enterprise originally registered through the official recommendation route or through self-submission.

This approach is based on two main considerations:



- First, the competent authority is often better placed than GACC to understand the real situation of its domestic enterprises and the relevant regulatory requirements, so centralised submission supports source-level supervision.
- Second, where several enterprises from the same country encounter problems at the same time, centralised handling by the competent authority may make it easier to take consistent measures at national level, contain risks at source, and avoid disruption to bilateral trade.

### **Cancellation – Article 24**

Two new grounds for cancellation were added to align with general Chinese administrative licensing laws: items (8) Granting registration to enterprises that are not eligible for application or do not meet the registration requirements, and item (9) Other circumstances under which registration may be revoked in accordance with the law. These are not substantive new restrictions but legal consistency updates.

### **Supplementary clarifications**

#### **Broader wording for high-risk scenarios**

Decree 280 adjusts the provisions in the final part of the rules relating to prohibitions or suspension measures. The previous wording in Decree 248 was narrower, whereas Decree 280 seeks to cover all situations that may give rise to major risks in more general terms. At the same time, GACC stressed that this drafting adjustment does not fundamentally alter the underlying implementation logic.

#### **Broader scope for bilateral agreements and special arrangements**

Under Decree 248, bilateral arrangements mainly concerned a limited number of matters such as registration methods and application materials. Decree 280, by contrast, brings all matters related to registration management within the scope of issues that may be adjusted or specially agreed through bilateral consultations. GACC considered that, provided there is a basis of mutual trust and cooperation, China and its partners may discuss registration management



arrangements that are more appropriate, more convenient, and more efficient.

### **About storage establishments, primary edible agricultural products, and CBEC**

Decree 280 and the supporting announcements provide clarification on a number of issues of concern to stakeholders. On storage establishments, the Chinese side explained that not all storage establishments need to be registered. According to Announcement No. 27 of 2026, the establishments currently falling within the registration scope are mainly cold storage facilities for terrestrial animal-derived food and aquatic products. Storage establishments for dairy products and other products do not fall within the registration scope.

Regarding primary edible agricultural products, GACC stated that the applicable regime should be read together with GACC Announcement No. 219 of 2025.

As regards cross-border e-commerce retail (CBEC), GACC explained that, although the text of Decree 280 provides that such products shall be handled in accordance with relevant rules, under Announcement No. 27 and the current Chinese rules on CBEC retail food, the products concerned do not currently require CIFER registration. GACC added that, if the relevant policy changes in future, GACC will notify the public in due course.

### **Custom declaration number and production date declaration requirements**

During customs declaration, enterprises must truthfully indicate the Chinese registration number of the overseas producer, and this number must correspond to the country or region of origin of the imported food. By way of example, GACC stated that if the product is of French origin, the registration number declared should be that of the corresponding French producer. It further explained that the registration number begins with the letter 'C', contains 18 characters in total, and that the second to fourth characters indicate the country or region in which the producer is located.



GACC then gave a detailed explanation of the rules for declaring production dates in different situations. If there is a single, specific production date, it should be entered in eight digits in the format 'YYYYMMDD'. If the production date is expressed as a period, such as where some aquatic products use the harvesting period as the production date, the starting date and the ending date should be connected by a half-width hyphen. Where the same enterprise declares the same product with several production dates, the dates should be separated by half-width semicolons. Where the same product involves different producers, the production dates corresponding to the different producers should be separated by half-width slashes. Where there is a combination of different producers and different dates, the above rules should be used in combination. GACC reiterated that, once Decree 280 is formally implemented, all registration management work will continue to be carried out through the CIFER system.

For products requiring official recommendation, the goods must be produced after the registration was granted.

For products not requiring official recommendation, registration must be completed before the goods are declared.

In general, if a registration is suspended, cancelled, or withdrawn, goods that were shipped before the effective date of that action can still be imported, unless a specific announcement states otherwise (e.g., suspension based on production date).

#### **Warning against fake websites**

GACC reminded all participants that there may be fake, counterfeit, or imitation websites of CIFER. Only the official platform at the URL <https://cifer.singlewindow.cn> should be used.



## **Part 2. Explanations of the upcoming CIFER system upgrade by Ms. Hu Ning**

### **Upgrade arrangements**

Before 1 June 2026, the CIFER system will continue to operate according to the logic of Decree 248, and the current operating methods will remain basically unchanged. A system upgrade is expected to take place around the end of May 2026, or possibly slightly before 1 June.

GACC stressed that this does not involve the launch of a completely new system but rather a functional upgrade of the existing CIFER platform. Accordingly, user data will not be lost and applications already in process should continue to be handled smoothly.

GACC further stated that approximately one to two weeks before the system upgrade, notices would be issued through channels both inside and outside the system setting out the exact upgrade time, the expected downtime, and the points requiring users' attention. The downtime is expected to be short—perhaps only half an hour to one hour. At the same time as the upgrade, or a few days before or after it, the new version of the enterprise user manual is expected to be released. The operational manual for the competent authority side is expected to remain mainly available after login.

### **Revised home page and public functions**

The CIFER home page has been redesigned and supports switching between Chinese and English. The public functions mainly comprise five parts: the filing guide, the list of registered enterprises, the food Directory, announcements and notices, and the user manual. The filing guide displays the processes and material requirements publicly issued by GACC. The list of registered enterprises allows searches by product category, country/region, Chinese registration number, and enterprise name. The food Directory allows searches by product category, HS code, or product name to determine the applicable categorisation and whether official recommendation is required. The announcements and user manual will also be available through the public



interface. These functions are intended to allow enterprises and authorities to obtain the most commonly needed information without logging in.

### **Three unchanged elements**

First, the system will continue to be free of charge. Second, the website address will remain unchanged. Third, the current accounts and passwords of enterprises and competent authorities will remain valid and can continue to be used after the upgrade.

### **Main application routes now**

After Decree 280 comes into effect, for products requiring recommendation by competent authority, there are three ways available.

The first is the traditional route, whereby the enterprise submits its application through the system to the competent authority, which reviews it and then recommends it to GACC.

The second is the direct enterprise submission route, whereby the enterprise first obtains the recommendation letter and inspection report from the competent authority and then submits the application itself through the system to GACC.

The third is the list registration route, whereby enterprises are still reviewed by the competent authority but are then submitted to GACC in batches under the list mechanism.

For products that do not require recommendation, enterprises will still submit directly to GACC.

If a particular product category has been through a list registration agreed by China and the foreign side, the competent authority may also recommend it through the list route.

The CIFER interface will guide applicants by displaying whether their product category requires official recommendation. Based on that, the system will present the available submission options.



### **Code management**

Regarding the code issue, CIFER progressively adopted broad-category registration in some product categories. Except for meat and a limited number of plant-origin foods, many categories of processed foods and aquatic products no longer require enterprises to select specific HS or 13-digit codes one by one; instead, the enterprise only needs to select the correct broad category. For some categories, the requirement to upload supporting documents (e.g., enterprise proof materials) has been replaced with a self-declaration checkbox.

### **Notifications for renewal**

For registrations not eligible for automatic renewal, the system is expected to send renewal reminders weekly to the contact email address provided by the enterprise at the time of application, and to do so in both Chinese and English to help enterprises avoid missing the relevant deadline.

For most categories, renewal is automatic and no action required from the enterprise or the authority. However, if an enterprise wishes to manually apply for renewal (e.g., to update information), the system allows it. When an enterprise initiates a renewal application for an automatically renewable category, the system will display a message: *"This registration is eligible for automatic renewal. Do you still wish to proceed with manual application?"*

### **Email accounts difference**

The account registration email is mainly used for account verification, password recovery, and similar matters. By contrast, the contact email provided in the registration application is used for operational notifications linked directly to registration matters. For this reason, GACC stressed the need for competent authorities and enterprises to ensure that the business contact email remains valid and accessible.

### **Update functions for competent authority**

Instead of one specific category of enterprises being viewable, the competent authority will see a broader set of registrations within its jurisdiction.



For list registration, additional options will also be added so that the competent authority can choose and submit several enterprises together where appropriate.

### **Retrieve accounts**

The competent authority side of the system can help enterprises retrieve their accounts, reset passwords, and update email addresses. The competent authority interface can search for the historical account information of enterprises by enterprise name and assist in resetting passwords or changing the email address, thereby helping enterprises regain access.



### **Part 3. Points mentioned during the Q&A session**

#### **User Manual**

*The system will be upgraded a few days before June 1, 2026. A notice will be issued 1-2 weeks in advance. The enterprise-side manual would likely be published either on the day of the upgrade or a few days before it. The manual for competent authorities, however, would mainly remain accessible after login.*

*Regarding Article 30 of Decree 280 and cross-border e-commerce (CBEC), is it still true that products sold on CBEC platforms do not need to be registered in CIFER? For example, infant formula sold via CBEC.*

*Yes, under current regulations, CBEC retail food imports do not require registration. This will not change after June 1, 2026.*

#### **Storage establishment related**

Under the current Announcement No. 27, only cold storage facilities for terrestrial animal-derived food and aquatic products fall within the registration scope, whereas dairy cold storage does not. If enterprises already have a registration need for the cold storage categories that are covered, such applications may still be submitted under the existing Decree 248 requirements through recommendation by the competent authority.

*How can authorities obtain the detailed requirements for different product categories? There is also a case where a hazelnut company tried to register three times and was rejected with vague reasons. Also, issues with email loss and competent authorities not being able to see some enterprises in the system.*

A new registration guide is being prepared and will include clearer details. For many product categories (e.g., aquatic products, nuts, wine), the system now uses broad-category registration, so enterprises no longer need to select specific HS codes.

For email issues, the technical support team can help update contact details after verifying identity.

If a competent authority cannot see an enterprise, it may be a system issue; they should contact GACC technical support.



### **Supervision and inspection reports, checklists and product requirements**

The supervision and inspection report is related in some way to the existing checklist, but the exact format may differ according to product category in the future, and it will be clarified in the subsequent guidance.

GACC added that registration and market access are two different regulatory matters, and they will consider this when preparing the new enterprise registration guide.

### **Code selection, broad-category registration, and authenticity verification**

Broad-category registration does not mean that all specific products under that broad category automatically obtain export eligibility; market access and product-level approval remain separate. Under the direct submission route, the authenticity of documents remains grounded in the role and responsibility of the competent authority, which is still the body issuing the recommendation letter and the inspection report. GACC stressed that direct submission by the enterprise does not eliminate the role of competent authority in producing authentic documents.

### **Information changes**

At system level, legal representative changes and address changes have already been opened for handling under the modification function. However, whether re-registration is required remains subject to GACC's substantive assessment.

A physical relocation of the production site is always a major change. A change of legal representative is considered major only if it reflects a change in the actual controller of the enterprise (e.g., ownership change leading to a different type of production).

*If a change is not major, what documentation is required?*

The application must include: (1) a comparative description of the changes (before and after); (2) the reasons for the changes. In general, if a change in legal representative does not affect the control relationship of the enterprise or the food safety management system in substance, it may be handled through modification. By contrast, a change involving the actual relocation of



the production site is, in principle, still treated as a major change requiring re-registration.

### **Existing registrations, pending applications, and the transition between the old and upgraded system**

This is not a transition from one independent system to another but an upgrade of the same CIFER system, meaning that the existing database remains unchanged. The status, validity period, and basic information of already registered enterprises will not be affected by the system upgrade as such.

As to applications currently under processing, GACC stated that they should, in principle, continue to be handled. However, if changes in policy requirements mean that some of the materials submitted under the old rules do not satisfy the new requirements, the system may return the application for supplementation. To reduce the burden on enterprises, the system has introduced a 'copy application' function, allowing the enterprise to reproduce its earlier application quickly and resubmit it after supplementing the new materials required.

### **Situations involving production in one country and bottling in another**

For products involving production in multiple countries, every enterprise in the production process needs to be registered.

During customs declaration, enterprises need to fill in the registration number of the manufacturing enterprise, and this should be consistent with the country and region of origin of the relevant products.

### **Rules on packaging marking**

If you only have inner packaging, label it on the inner packaging.

If both inner and outer packaging exist, the relevant registration information still needs to be marked on both in accordance with applicable rules. The number can be either the Chinese registration number or the local registration number.



### **The renewal**

For products meeting the conditions for automatic renewal, no further action is in principle required from the enterprise or the competent authority.

The categories not eligible for automatic renewal are determined by the annex to Announcement No. 27 published on 18 March.

Casings are treated as part of the animal-derived category and therefore do not fall within the scope of automatic renewal.

GACC added that the list of products eligible or ineligible for automatic renewal is dynamic and must be read together with the officially published lists. If, for technical reasons, an automatic renewal fails to be completed in the system, the enterprise may report the issue to GACC, which may then restore the status after verification.

### **Handling EC origin code change to EU**

GACC explained that it had taken note of the relevant EU rule changes and would prefer the competent authority to send a unified official letter rather than having each enterprise apply individually. Based on such a formal letter, GACC could carry out batch modifications in the background. This helps customs clearance bodies understand that the change reflects a system-level rule adjustment rather than a substantive change at each individual enterprise.

### **Scope of application of the List registration**

GACC explained that existing historical agreements, protocols, and cooperation documents may in practice serve as background material for subsequent communication and consultation. Where a cooperative basis already exists between China and the foreign side, and the products concerned fall within a scope agreed by both sides, it is in principle possible to discuss the use of list registration.

*If a company registers under a broad category (e.g., nuts), does that mean it is automatically authorized to export all nuts (e.g., almonds, walnuts) even if market access only exists for one?*



Registration assigns all HS codes in that category, but market access is separate. If a specific product (e.g., walnuts) does not have market access approval, it cannot be imported even if the company is registered.

*If a company uses the new direct-to-GACC pathway by obtaining a recommendation letter and inspection report from the competent authority, how does GACC verify the authenticity of those documents if the authority does not forward them through the system?*

This is one of three pathways. The competent authority remains responsible for issuing genuine documents. GACC will rely on the bilateral trust framework. The other pathways (authority-forwarded or list registration) remain available.

*Under Article 17, can existing protocols (e.g., meat protocols signed in the last five years) serve as the basis for list registration? Also, is there an example of how the competent authority can send a list in the system?*

Yes, existing protocols or MOUs can be a basis for implementing list registration. Specific implementation requires bilateral consultation and may be done through amending existing agreements. For system operation, the competent authority will be able to select multiple applications and submit them together as a list.

*For a suspended company, how long does it take to restore registration? Is the restoration process handled through the CIFER system?*

The time varies depending on the issue. The rectification report must be submitted via CIFER. GACC will review and, if approved, restore the status in the system and notify the company by email and system alert.

*Can a suspended company continue to produce products?*

Production is allowed, but export to China is prohibited. For products requiring official recommendation, goods produced during the suspension cannot be exported even after the suspension is lifted (production date matters). For products not requiring official recommendation, only the registration status at the time of declaration matters.

*For storage facilities, the non-automatic renewal list includes meat, etc. Is that the same for storage?*



The non-automatic renewal list applies to production enterprises (meat, bird's nest, animal-derived products, etc.). Storage facilities have a separate registration requirement (cold storage for animal-derived and aquatic products), but their renewal rules follow the same automatic/non-automatic categories.

*If a company eligible for automatic renewal is about to expire and the system fails to auto-renew due to a technical problem, what happens to goods arriving at the border?*

System reliability is very high. If such a situation occurs, the company can report it to GACC. The issue will be fixed promptly, and the registration status will be restored.

*When should the letter regarding the EU code change be sent? Should we list all companies or just provide the rule?*

The letter can be sent at any time. It can list all affected enterprises or describe the rule so that GACC can apply the change systematically.

*If companies change names or numbers at different times, and packaging shows the old information during the transition, will customs accept it?*

Since the Chinese registration number does not change, the shipment can be cleared. If inspected, the company can provide an explanation that the change is in progress.

*For avian influenza regionalization: when the department of animal and plant quarantine lifts restrictions on a region, is the suspension of companies automatically lifted on the same date?*

No. Import and Export Food Safety Bureau conduct its own assessment and will issue an announcement specifying the effective date from which companies can resume exports. The two processes are separate.



## **Part 4. Q&A with participants**

### **Continuity of existing registered enterprises and existing accounts in the new system**

GACC clearly stated that CIFER will not be replaced by a new system but rather upgraded; existing user accounts, passwords, and the system address will remain unchanged, and existing registrations will in principle not be affected by the upgrade.

### **Handling of pending applications**

GACC made clear that, as a rule, pending applications may continue to be processed. Where additional materials are required because of changes in the policy framework, the system may return the application, and the copy-application function will be available to facilitate resubmission.

### **Existence of the Directory and its dynamic management**

GACC clearly confirmed that the Directory mechanism has been established, has already been published together with Announcement No. 27, and will in future be updated dynamically based on risk assessment.

### **Continued possibility of direct registration for lower-risk products**

GACC made clear that some lower-risk products have been removed from the scope of products requiring recommendation by the competent authority; products not included in the Directory still need registration but may be submitted directly.

### **Whether dairy cold storage facilities must be registered**

GACC again confirmed that dairy cold storage facilities are currently outside the registration scope.

### **Whether CBEC retail products require CIFER registration**

GACC confirmed that CBEC retail products do not, under the current rules, require CIFER registration.



### **The general logic of automatic renewal**

GACC clearly stated that, apart from the categories listed in the non-automatic renewal list, the remaining categories may in principle benefit from automatic renewal.

### **Whether changes such as the legal representative or a general change in registration numbering will automatically require re-registration**

GACC made clear that these matters no longer automatically require cancellation and re-registration but will instead be dealt with through the modification mechanism, subject to GACC's assessment as to whether the change is material.

### **Whether list registration and the traditional route will coexist**

GACC confirmed that the two routes will coexist and that enterprises may continue to use the ordinary application route.

### **Whether the system is being completely rebuilt**

GACC clearly stated that CIFER will not be replaced by a completely new system.