Vols exportar a **Xina** i/o **Taiwan**? **Certificacions** requerides i altra informació d'interès

#FormacióProdeca

Pablo Recio Gracia
Andrés Herrera-Feligreras
EIBENS - Antena Prodeca Xina
27 de juny 2024

Prodeca
Promotora dels aliments catalans

Generalitat de Catalunya



Barriers of exporting to China. Before and Now



VULL EXPORTAR PRODUCTES ALIMENTARIS A LA XINA:
PER ON COMENÇO?

Pablo Recio Gracia: Antena Prodeca Xina - Director Gerent d'EIBENSA
Andrés Herrera-Feligreras: Antena Prodeca Xina - Soci fundador d'Herrera Zhang

Prodeca Generalitat de Catalunya sempre endavant

9 d'abril de 2024

In April we explained and broke down the context and evolution of the Chinese (Mainland, Taiwan, Hong Kong) market

One of the principal complexities that companies have to address are the regulatory procedures and barriers to gain market access in China

This webinar intends 2 things

Provide a clear view of the different market access aspects that our exporters need to know so risks and efforts are reduced

A specific insight on how decree 248 and the registration in CIFER works

The food regulation landscape in China has a certain level of complexity, and more importantly is quite dynamic. Subsequently, while the information here is up to date at the time of writing, it is strongly recommended that regulation for the product in question be monitored.

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CONTENT

1 Protocols and company listings

2 Manufacturer Registration; CIFER

3 Exporter Registration

4 Labelling

5 IP Protection. Trademarks

CONTENT

1 Protocols and company listings

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Protocols and company listings

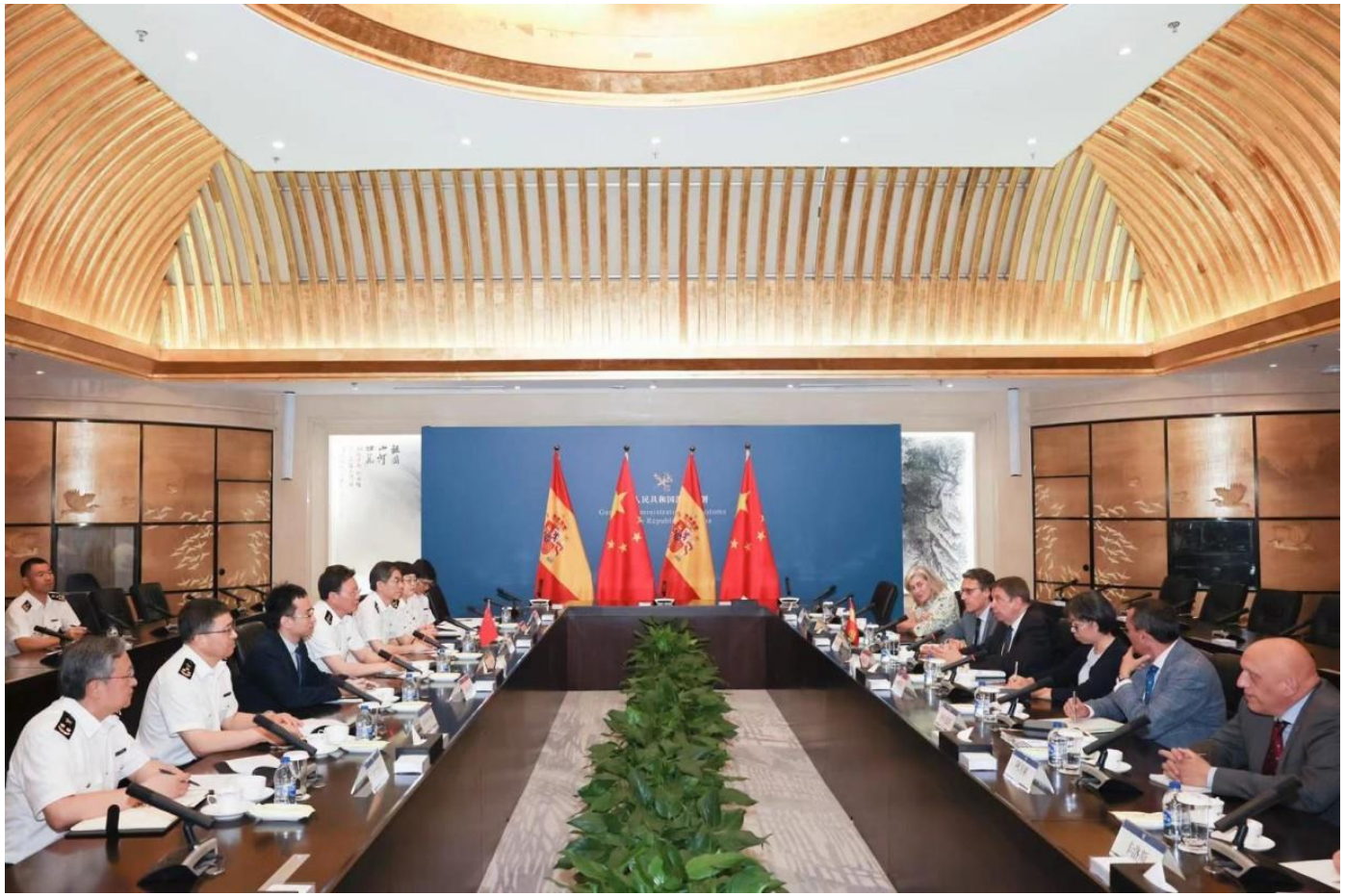
What is a protocol?

Do all products need a protocol to be exported?

What do they cover?

What is the process?

How long it takes?



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Protocols and company listings

Spain´s meat example

Protocolo sobre los requisitos veterinarios y sanitarios para la carne y productos cárnicos curados de porcino

GOBIERNO DE ESPAÑA

EXPORTACIÓN A CHINA

INFORMACIÓN ESPECÍFICA - PROCEDIMIENTO DE AUTORIZACIÓN DE ESTABLECIMIENTOS PARA LA EXPORTACIÓN DE CARNE DE PORCINO DESTINADOS A CONSUMO HUMANO

La información recogida en esta Nota Informativa es complementaria a lo descrito en el "Procedimiento de solicitud de inclusión en listas de establecimientos autorizados para exportar productos de origen animal destinados al consumo humano a terceros países", [1]

Introducción:

De acuerdo con artículo 7 del *Reglamento Administrativo de Registro de las Empresas de Ultramar Productoras de Alimentos de Importación de la República Popular China (orden nº 248)* de la Administración General de Aduanas de la República Popular China (AGA), es obligatorio que las industrias elaboradoras de carne de porcino estén incluidos en el Registro de Empresas Productoras para así poder exportar a China.

Conforme a lo anterior, y de acuerdo a lo establecido en el RD 993/2014, los establecimientos interesados en ser autorizados para este mercado deberán cursar su solicitud según lo establecido en el "Procedimiento de solicitud de inclusión en listas de establecimientos autorizados para exportar productos de origen animal destinados al consumo humano" (publicado en CEXGAN), teniendo en cuenta, asimismo, la información especifica recogida en esta nota informativa.

Ámbito de aplicación

Este registro es para la exportación de:

1 Carne de porcino congelada (Frozen pork)

2 Carne de porcino refrigerada (Chilled pork)

MINISTERIO DE SANIDAD

DIRECCIÓN GENERAL DE SALUD PÚBLICA, CALIDAD E INNOVACIÓN

SUBDIRECCIÓN GENERAL DE SANIDAD EXTERIOR

RC/2017

NOTA INFORMATIVA PARA EL PROCESADO Y EXPORTACIÓN DE CARNE DE PORCINO, PRODUCTOS CÁRNICOS, DESPOJOS COMESTIBLES, MANOS Y PATAS DE CERDO A LA REPÚBLICA POPULAR CHINA

(Revisión 4, de 13 de febrero de 2020)

Para la exportación de carne y productos derivados del porcino, las empresas deben haber sido autorizadas por la Administración General de Aduanas de la República Popular de China (GACC) de la República Popular de China, constando en los listados de autorización los tipos de productos que cada empresa puede exportar, conforme al Protocolo acordado por GACC con las autoridades españolas en 2018[1]. Siguiendo las recomendaciones de las auditorías del GACC a los establecimientos españoles, los despojos, las manos y patas y resto de productos deben procesarse bajo condiciones higiénicas y, asimismo, contar con un programa analítico de autocontrol específico.

Tras la visita del GACC en 2016, las autoridades chinas han determinado la necesidad de reevaluar el Protocolo, incluyendo un anexo que lista los despojos que pueden exportarse y que, asimismo, establecer los criterios de seguridad alimentaria aplicables, junto con los requerimientos de los programas de muestreo. Al objeto de que las empresas adapten sus sistemas de autocontrol a estos nuevos criterios, procede reevaluar y refundir las notas informativas que se han aplicado hasta el momento en una nueva nota que recoja los requerimientos indicados en esta y en anteriores visitas de las Autoridades chinas.

Esta nota será de aplicación para:

- Los establecimientos autorizados a exportar carne, productos cárnicos, despojos comestibles, manos y patas a la República Popular de China y,
- Las actuaciones establecidas en el Real Decreto 993/2014:
  - Propuesta de inclusión en listas de exportación (supeditado a visita del GACC)
  - Modificación del alcance de autorización (ampliación de productos).

Esta nota informativa anula y sustituye a la *Nota informativa para el procesado y exportación de carne de porcino, productos cárnicos, despojos comestibles, manos y patas de cerdo a la República Popular China (enero 2019).*

APÉNDICE DE CAMBIOS

MINISTERIO DE AGRICULTURA, PESCA Y ALIMENTACIÓN

GABINETE DE PRENSA

Nota de prensa

En el marco de la visita de Estado del Presidente Xi Jinping

España y China suscriben Protocolos sanitarios para la exportación de uva de mesa y de carne y productos curados de porcino españoles al país asiático

- **Estos acuerdos permitirán el inicio de las exportaciones de uva de mesa y la ampliación de los productos de porcino desde España hacia la República Popular China**
- **La próxima publicación de los certificados de exportación y la organización de la campaña por parte del Ministerio de Agricultura, Pesca y Alimentación posibilitarán las exportaciones de manera inmediata a través de las aplicaciones informáticas CEXVEG y CEXGAN**
- **El comercio agroalimentario entre España y China ha crecido de forma exponencial durante los últimos años**

28 de noviembre de 2018. En el marco de la visita a España del Presidente de la República Popular China, Xi Jinping, ha tenido lugar hoy la firma de dos Protocolos que permitirán el inicio de las exportaciones de uva de mesa y la ampliación de los productos de porcino desde España hacia el país asiático.

Protocols and company listings

Companies listing and updates

Manufacturers need to come into these protocols in a **“List of establishments”** that have been previously approved by Chinese customs

Protocols do evolute and may integrate or reject establishments during time

Spain and other oversea markets are **constantly negotiating to obtain new protocols** that will allow the exports of new and banned food categories

China will have to make **on-site visits** to a large number of production plants in order to accept a new protocol

MINISTERIO
DE AGRICULTURA,
PESCA Y ALIMENTACIÓN

LISTA DE ESTABLECIMIENTOS ELABORADORES, AUTORIZADOS PARA LA EXPORTACIÓN DE CARNE Y PRODUCTOS CÁRNICOS DE PORCINO A LA REPÚBLICA POPULAR CHINA
(Actualizado 07 de junio de 2024)

nº	Nº RGSEAA	Nombre del establecimiento	Dirección	Localidad	Provincia	Actividades autorizadas por China	PRODUCTOS AUTORIZADOS
1.	10.00092/TO	CAMPOFRIO FOOD GROUP, S.A.	CTRA. TOLEDO-AVILA, KM. 27,4	TORRIJOS	Toledo	PP	• Jamón / paleta curado (con o sin hueso), • Jamón serrano (con o sin hueso), • Jamón / Paleta Ibérica (con o sin hueso)
2.	10.00159/H	SANCHEZ ROMERO CARVAJAL JABUGO S.A.	CARRETERA CTRA. SAN JUAN DEL PUERTO S/N	JABUGO	HUELVA	SH, CP, PP CS	• Carne de cerdo congelada. (con y sin hueso) • Carne de cerdo refrigerada (con y sin hueso) • Grasa de cerdo congelada y refrigerada sin refinar • Vísceras y despojos de cerdo comestibles congelados : corazón, hígado, riñón, lengua, cola, oreja, testículos, nariz, codillo, cara, labio, mandíbula, aortas, piel, cabeza, cerebro, diafragma, cartílago, tráquea, esófago, garganta, pene y huesos. • Jamón / paleta curado (con o sin hueso). • Jamón /paleta ibérica (con o sin hueso) • Lomo • Chorizo • Salchichón
3.	10.00285/MA	FRIGORIFICOS ANDALUCES DE CONSERVAS DE CARNE, S.A. (FACCSA)	PLAZA PROLONGO, 2	CARTAMA	MALAGA	CP, CS	• Carne de cerdo congelada (con y sin hueso) • Carne de cerdo refrigerada (con y sin hueso) • Grasa de cerdo congelada y refrigerada sin refina • Vísceras y despojos de cerdo comestibles congelados : corazón, hígado, riñón, lengua, cola, oreja, testículos, nariz, codillo, cara, labio, mandíbula, aortas, piel, cabeza, cerebro, diafragma, cartílago, tráquea, esófago, garganta, pene y huesos. • Patas de cerdo congeladas

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Protocols and company listings

(Phyto) Sanitary certificate

The General Administration of Customs of the People's Republic of China (GACC) is responsible for the implementation of the new certificates.

中华人民共和国出入境检验检疫
ENTRY-EXIT INSPECTION AND QUARANTINE
OF THE PEOPLE'S REPUBLIC OF CHINA

正 本
ORIGINAL

植 物 检 疫 证 书 编号 No.:
PHYTOSANITARY CERTIFICATE

发货人名称及地址 Name and Address of Consignor	自：植物保护机构 From: Plant Protection Organization(s) of
收货人名称及地址 Name and Address of Consignee	至：植物保护机构 To: Plant Protection Organization(s) of
品名 Name of Produce	植物学名 Botanical Name of Plants
报检数量 Quantity Declared	标记及号码 Mark & No.
包装种类及数量 Number and Type of Packages	
原产国 Country of Origin	目的地国 Country of Final Destination
运输工具 Means of Conveyance	到达口岸 Port of Destination
产地 Place of Origin	检验日期 Date of Inspection

兹证明上述植物、植物产品或其他限定物已按照有关官方程序进行检查和/或检验,被认为无输入国或地区规定的检疫性有害生物,因而符合输入国或地区的现行植物检疫要求,包括对限定的非检疫性有害生物的要求。

This is to certify that the plants, plant products or other regulated articles described herein have been inspected and/or tested according to appropriate official procedures and are considered to be free from the quarantine pests specified by the importing country/ region and to conform with the current phytosanitary requirements of the importing country/region, including those for regulated non-quarantine pests.

杀虫和/或灭菌处理 DISINFESTATION AND/OR DISINFECTION TREATMENT

日期 Date	处理方法 Treatment
持续时间及温度 Duration and Temperature	药剂及浓度 Chemical and Concentration
其他情况 Additional Information	

附加声明 Additional Declaration

印章	签证地点	签证日期

中华人民共和国出入境检验检疫
ENTRY-EXIT INSPECTION AND QUARANTINE
OF THE PEOPLE'S REPUBLIC OF CHINA

正 本
ORIGINAL

植 物 转 口 检 疫 证 书 编号 No.:
PHYTOSANITARY CERTIFICATE FOR RE-EXPORT

发货人名称及地址 Name and Address of Consignor	自：转口植物保护机构 From: Plant Protection Organization(s) of
收货人名称及地址 Name and Address of Consignee	至：植物保护机构 To: Plant Protection Organization(s) of
品名 Name of Produce	植物学名 Botanical Name of Plants
报检数量 Quantity Declared	标记及号码 Mark & No.
包装种类及数量 Number and Type of Packages	
原产国 Country of Origin	目的地国 Country of Final Destination
运输工具 Means of Conveyance	到达口岸 Port of Destination
产地 Place of Origin	检验日期 Date of Inspection

兹证明上述植物、植物产品或其他检疫物从_____运入中国，附有编号为_____的植物检疫证书，其正本□* 经签署的副本□附于本证书后，并证明这些植物及其产品以原来的□ 新的□ 容器进行包装□ 再包装□，根据原来的植物检疫证书□ 和进一步检验□，被认为符合输入国或地区现行的植物检疫要求，而且在中国存放期间，该批货物没有受到病虫感染的威胁。

This is to certify that the plants, plant products or other regulated articles described above were imported into the People's Republic of China from_____covered by Phytosanitary Certificate No. _____, original □* certified true copy □ of which is attached to this Certificate; that they are packed □repacked □ in original □ new □ containers, that based on the original Phytosanitary Certificate□and additional inspection □, they are considered to conform with the current phytosanitary requirements of the importing country/region, and that during storage in China the consignment has not been subjected to the risk of infestation or infection.

*在适当的□内划"√" Insert tick in appropriate □ boxes

杀虫和/或灭菌处理 DISINFESTATION AND/OR DISINFECTION TREATMENT

日期 Date	日期 Date
持续时间及温度 Duration and Temperature	持续时间及温度 Duration and Temperature
其他情况 Additional Information	

印章 Official Stamp	签证地点 Place of Issue	签证日期 Date of Issue
	授权签字人 Authorized Officer	签名 Signature

中华人民共和国出入境检验检疫机关及其官员或代表不承担签发本证书的任何财经责任。No financial liability with respect to this certificate shall attach to the entry-exit inspection and quarantine authorities of the P. R. of China or to any of its officers or representatives.

[c5-2(2023.3.9) * 1]

BB0000001

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Protocols and company listings

For Spain, there are some protocols signed and going on; **work is being carried out in different areas for new openings of Spanish products**, in addition to continuing to make progress in the opening new categories.

Pork products (expanded in several occasions), fishery products, fruits (citric, stone fruits, table grapes, pet food, dehydrated alfalfa, dehydrated oaten hay, honey related products, khaki, almonds, beet pulp, filling, dough and filling foods…..

With other in negotiation such as cherries, pork expansion, lamb, beef, poultry, pistachio…

How is the company listing per category?

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CONTENT

1 Protocols and company listings

2 Manufacturer Registration; CIFER

3 Exporter Registration

4 Labelling

5 IP Protection. Trademarks

2

Decree 248. Manufacturer registration. CIFER

- Background. Why and what does it imply
- Authorities involved
- What companies register and which ones do not
- Different cases of registration
- How do I operate the platform?
- Cost and timings

BACKGROUND. WHY AND WHAT DOES IT IMPLY

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Manufacturer registration. Decree 248 CIFER. **Background. Why and what does it imply?**

"The regulations to strengthen the registration management of overseas manufacturers of imported foods"

In 2015, The Food Safety Law starts serving as the overarching legislation governing food safety in China

- Comprehensive guideline for production, import, export, sale, recall and traceability of food products in the country

In April 2021, **the General Administration of Customs China (GACC)** announced two new decrees which both have come into force on 1st January 2022:

- **Decree 248**: Regulations of the People's Republic of China on the Registration and Administration of Overseas Manufacturers of Imported Food
- **Decree 249:** The Measures of the People's Republic of China for the Administration of Import and Export Food Safety

Significant changes to the regulatory framework for imported foods, with a focus on strengthening supervision and the oversight of overseas food putting more responsibility in exporters, manufacturers and their relevant authorities

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Manufacturer registration. Decree 248 CIFER. **Background. Why and what does it imply?**

GACC *(General Administration of Customs)* is the agency responsible for supervising and managing the registration of overseas establishments producing, processing, or storing F&B products exported to China

- The fundamental purpose of GACC Decree 248 and 249 is to **enhance and ensure the safety of F&B products** imported to China, and thus the health of Chinese consumers
- **Responsibility of overseas establishments and governments is increased** in terms of the authenticity of the information submitted, process and updates
- **GACC conducts risk analysis** to determine the registration method that overseas establishments must follow
- **GACC negotiates the requirements** and application materials with the competent authority of the country where the establishment is based
- **Process is different depending on the type of product** and Chinese authorities reserve the right to request additional data

How has the implementation process been?

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AUTHORITIES INVOLVED

Manufacturer registration; CIFER. **Authorities involved**

GACC General Administration of Customs
http://online.customs.gov.cn/

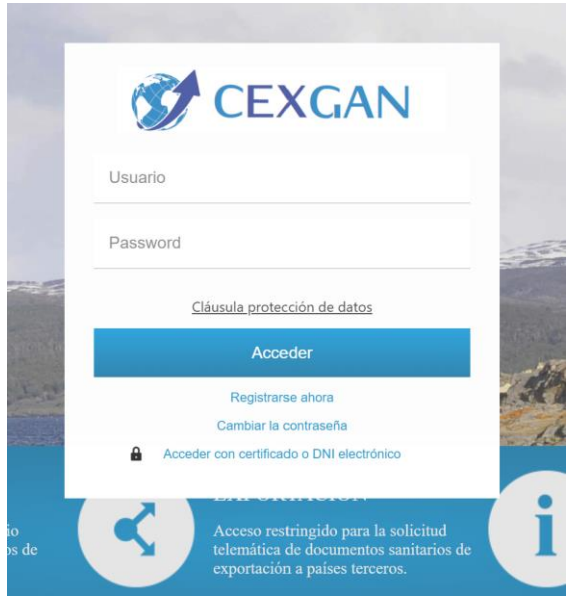
MISAN Ministerio de Sanidad
exportacionsanidad@sanidad.gob.es

MAPA Consejería de Agricultura, Pesca y Alimentación
exportacionanimal@mapa.es

MAPA (Pekín)
pekin@mapa.es

CEXGAN Comercio Exterior
CEXGAN - Comercio Exterior (mapama.gob.es)





WHAT COMPANIES REGISTER AND WHICH ONES DO NOT

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CIFER. What companies register? which ones do not?

CIFER registration

(*manufacturers*)

All overseas establishments producing, processing, or *storing* F&B products

Production and processing that refer to products suitable for human consumption

Storing implies temperature regulated or manipulation but NOT room temperature

(so called) High-risk product categories (18)

(so-called) low-risk product categories (the rest)

NO - CIFER registration

(*traders or room temperature storage*)

Room temperature warehouses that do not carry out product manipulation .

Traders or exporters who only carry out commercialization tasks.

CBEC

Food additives

Fresh fruits

Some primary agriculture products
- fresh vegetables
- edible cereals
- dried peas and beans
- oilseeds

Animal feed

BUT the registration for exporters is still needed for exporters

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DIFFERENT CASES OF REGISTRATION

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Manufacturer registration. CIFER. **Different cases of registration 5 cases.**

How does it affect me?

5 cases

1.a

High before and high risk now. Never registered



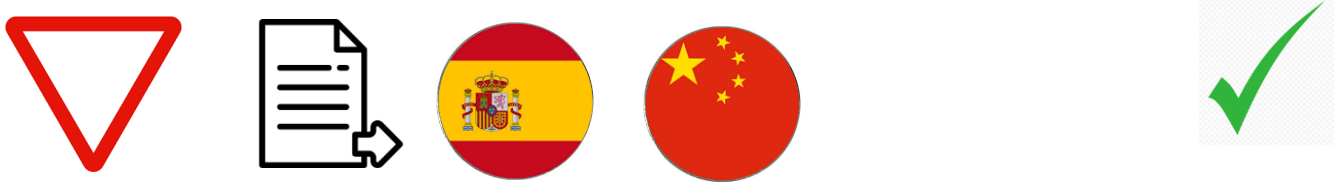
1.b

High before and high now. Previously registered
Eg, meat



2.a

Low risk before but high now.
No previous exports.
Eg. Olive oil



2.b

Low risk before but high now.
Previous exports



3

Low risk before and now
Eg. Wine



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Manufacturer registration. CIFER. **New list of high risk categories**

Recommendation from Spain authorities needed. (article 7 of Decree 248), new establishments producing **“high-risk”** food will have to obtain their registration number via the Spanish administration (MAPA, MISAN)

- Meat and meat products (beef, pork, mutton, poultry, rabbit…)
- Casings (pig/sheep/cow intestines casings)
- Aquatic products
- Dairy products (milk products, including infant formula)
- Edible bird’s nest and bird’s nest products
- Bee products
- Eggs and egg products
- **Edible vegetable oils and oilseeds**
- **Stuffed pastry products**
- Health food
- Edible grains
- Grain milling industrial products and malt
- Fresh and dehydrated vegetables, dried beans
- **Natural plant spices**
- **Seasonings**
- Nuts and seeds
- **Dried fruits**
- Unroasted coffee beans and cocoa beans
- Nutritional supplements

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Manufacturer registration. CIFER. **Case studies**

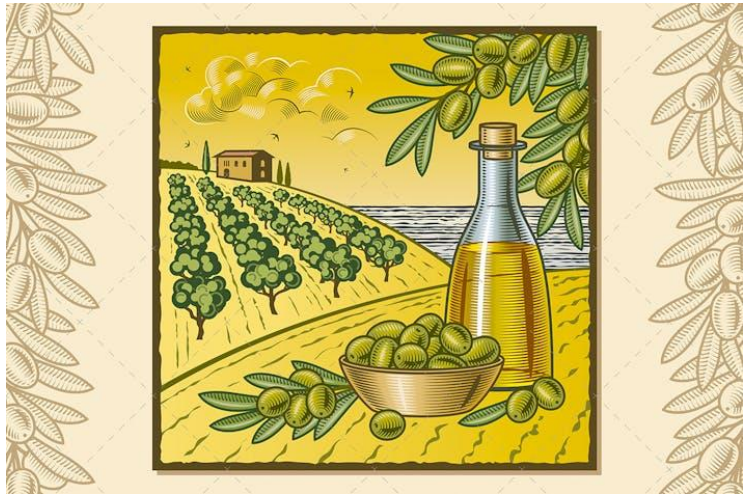
3 different food products allow us to understand how barriers and procedures have evolved after the implementation of Decree 248/249 in China

case 1 Meat products



1.a 1.b

case 2 olive oil



2.a 2.b

case 3 wine



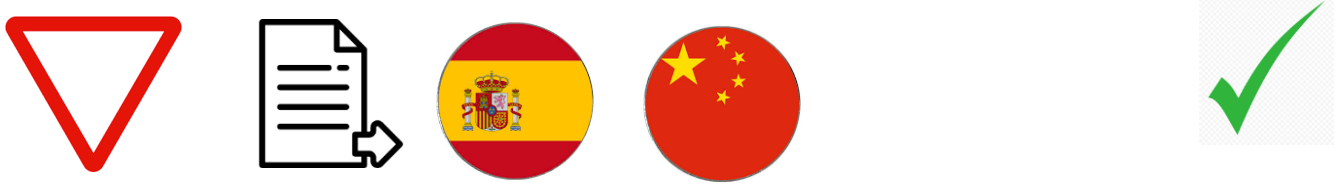
3

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Manufacturer registration. CIFER. **Different cases of registration. High risk**

How does it affect me?

5 cases

1.a	High before and high risk now. Never registered	
1.b	High before and high now. Previously registered Eg, meat	
2.a	Low risk before but high now. No previous exports. Eg. Olive oil	
2.b	Low risk before but high now. Previous exports	
3	Low risk before and now Eg. Wine	

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Manufacturer registration; CIFER. **Case study. Meat**

Protocol needed. Pork processing industries must be be included in **the list of approved companies to export to China**

Application area

- Frozen pork
- Ham: serrano ham, Iberian ham, shoulder ham
- Chilled pork
- Loin, chorizo, *salchichón*
- Frozen pig's feet and hands
- Offal, viscera and fat products

Eligibles establishments

Slaughterhouses / Cutting Rooms / Cold Storages







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Manufacturer registration. CIFER registration. **High risk, "new" companies**

1.a

Need to be in the approved list first

1 **Gathering documentation**

- Cuestionario de registro
- Basic establishment info
- Supporting material (photos)
- Compliance checklist for meat

2 **Application**

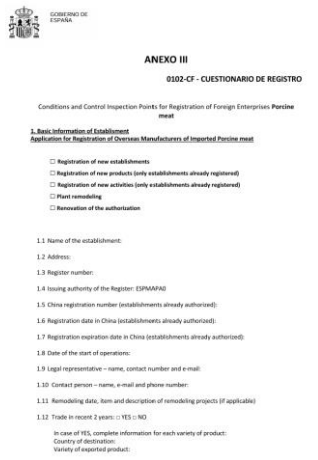
- submission of documentation via CEXGAN
- Specification of products (HS/CIQ) from CIFER
- Preliminary revision from CCAA and official inspection

3 **Approval by MISAN**

CIFER processing

After GACC approves the establishment, registration through CIFER is mandatory

- **Info submitted has to be aligned in both Chinese and Spanish platforms**
- **Inspections to establishments may happen at any time**
- **Follow the requirements from the signed protocol**



ANEXO III

0102-CF - CUESTIONARIO DE REGISTRO

Conditions and Control Inspection Points for Registration of Foreign Enterprises Porcine meat

1. Basic information of Establishment
Application for Registration of Overseas Manufacturers of Imported Porcine meat

☐ Registration of new establishments
☐ Registration of new products (only establishments already registered)
☐ Registration of new activities (only establishments already registered)
☐ Plant remodeling
☐ Renovation of the authorization

1.1 Name of the establishment:
1.2 Address:
1.3 Register number:
1.4 Issuing authority of the Register: ESPMAPA0
1.5 China registration number (establishments already authorized):
1.6 Registration date in China (establishments already authorized):
1.7 Registration expiration date in China (establishments already authorized):
1.8 Date of the start of operations:
1.9 Legal representative – name, contact number and e-mail:
1.10 Contact person – name, e-mail and phone number:
1.11 Remodeling date, item and description of remodeling projects (if applicable)
1.12 Trade in recent 2 years: □ YES □ NO
In case of YES, complete information for each variety of product:
Country of destination:
Variety of exported product:

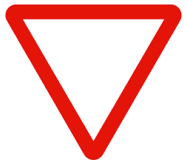
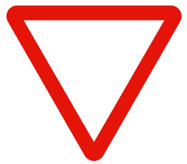




Manufacturer registration. CIFER. **Different cases of registration. High risk but previously registered**

How does it affect me?

5 cases

1.a	High before and high risk now. Never registered	      
1.b	High before and high now. Previously registered Eg, meat	  
2.a	Low risk before but high now. No previous exports. Eg. Olive oil	    
2.b	Low risk before but high now. Previous exports	     
3	Low risk before and now Eg. Wine	   

CONFIDENTIAL

Manufacturer registration. CIFER registration. **High risk but previously registered**

1.b

Facilities already exporting when Decree 248 came into effect

In this particular case the Chinese authorities manage the data migration and provided user, password and filled in data.

GACC decree 248 does not change procedures

already registered by GACC as a high risk imported food

- ✓ Maintenance of its status
- ✓ List of establishments and kept exporting
- ✓ GACC provides a CIFER number

MINISTERIO
DE AGRICULTURA,
PESCA Y ALIMENTACIÓN

LISTA DE ESTABLECIMIENTOS ELABORADORES, AUTORIZADOS PARA LA EXPORTACIÓN DE CARNE Y PRODUCTOS CÁRNICOS DE PORCINO A LA REPÚBLICA POPULAR CHINA
(Actualizado 07 de junio de 2024)

- ➢ 65 approved meat – establishments
- ➢ 27 Catalan companies in the list

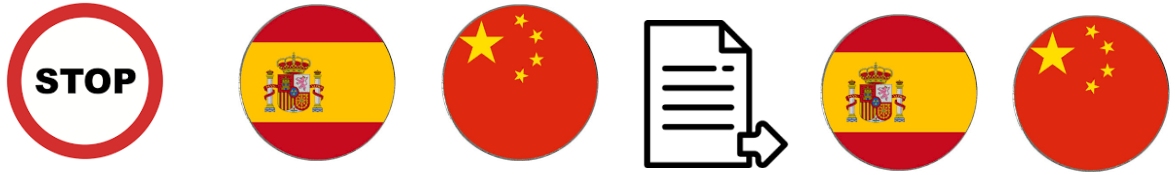
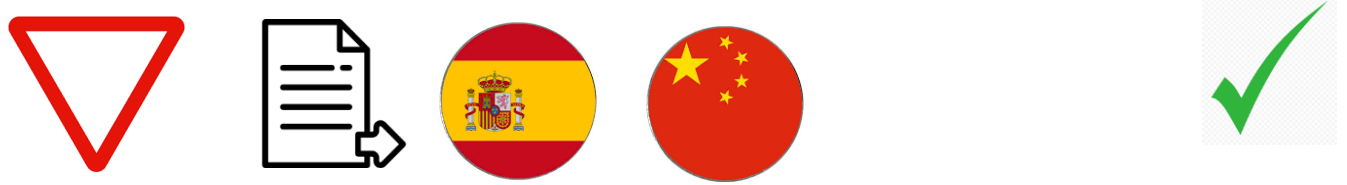
How was the application?

What happens if I need to change any data?

Manufacturer registration. CIFER. **From low to high risk, no export record**

How does it affect me?

4+1 cases

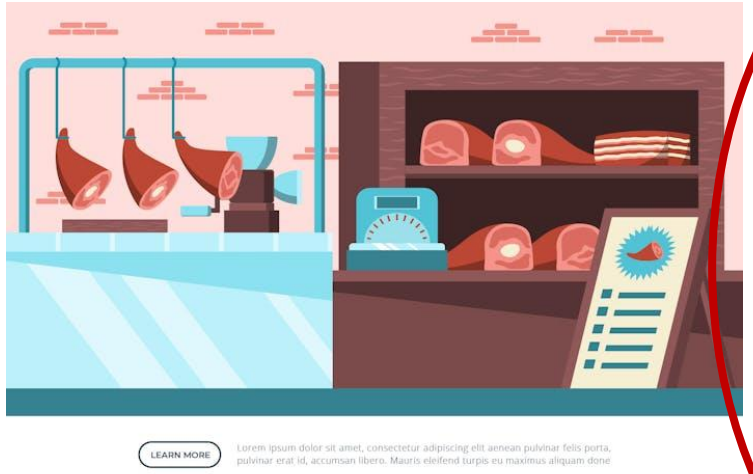
1.a	High before and high risk now. Never registered	
1.b	High before and high now. Previously registered Eg, meat	
2.a	Low risk before but high now. No previous exports. Eg. Olive oil	
2.b	Low risk before but high now. Previous exports	
3	Low risk before and now Eg. Wine	

CONFIDENTIAL

Manufacturer registration. CIFER. **Case studies**

3 different food products allow us to understand how barriers and procedures have evolved after the implementation of Decree 248/249 in China

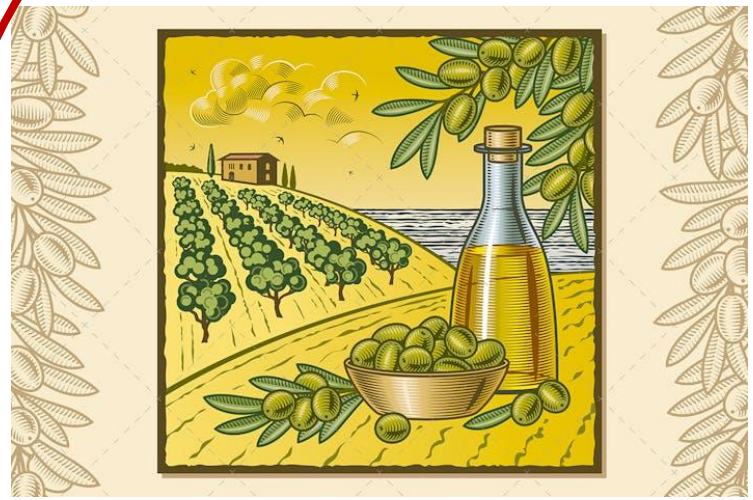
case 1 Meat products



1.a

1.b

case 2 olive oil



2.a

2.b

case 3 wine



3

CONFIDENTIAL

Manufacturer registration. CIFER. **From low to high risk, no export record**

2.a

If the product is high risk, **it goes under "recommendation"**. The company cannot start registration on its own and will need to contact the competent authority in Spain to provide the needed documents and they will check them and in turn communicate with GACC

MINISTERIO DE AGRICULTURA, PESCA Y ALIMENTACIÓN

The Ministry of Agriculture, Fisheries and Food (MAPA)

GOBIERNO DE ESPAÑA MINISTERIO DE SANIDAD

The Ministry of Health (MISAN)

Verification of the establishment's compliance with China's safety requirements

GACC, after technical review, approves and gives an account (user name and password) to overseas authorities to continue with registration (via CIFER). CIFER will already have some data included.

What happens if the input data is wrong or I need to change it?

CONFIDENTIAL

Manufacturer registration. CIFER. **From low to high risk, no export record**

2.a

1 Recommendation/request to MISAN

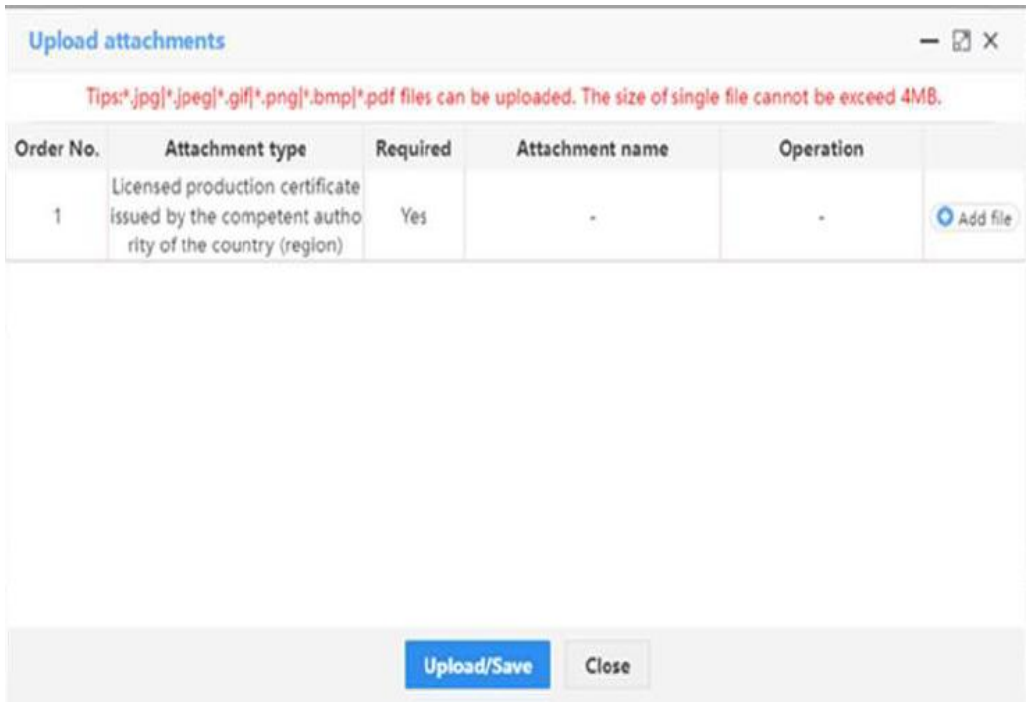
The competent authority of the exporting country must inspect the recommended company

Once it has verified the company's compliance with the registration requirements, it will recommend the company to GACC, **by submitting**

1. *letter of recommendation prepared by MISAN*
2. *List of applicant companies*
3. *Business identity documents*
4. *Statement from MISAN that the company complies with the regulations*
5. *Inspection report*

2 CIFER Application

Licensed production certificate issued by MISAN has to be uploaded to CIFER



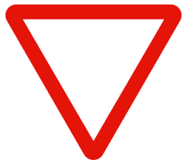
In what language do I submit the documentation?

How much time it takes?

Manufacturer registration. CIFER. **From low to high risk, WITH export record**

How does it affect me?

5 cases

1.a	High before and high risk now. Never registered	STOP							
1.b	High before and high now. Previously registered Eg, meat	STOP							
2.a	Low risk before but high now. No previous exports. Eg. Olive oil								
2.b	Low risk before but high now. Previous exports								
3	Low risk before and now Eg. Wine								

CONFIDENTIAL

Manufacturer registration. CIFER. **From low to high risk, WITH export record**

2.b

Those with a previous export record were introduced in CIFER directly with temporary validity

To avoid considerable conflicts in the transition from low to high risk, China requested other countries for companies with an export record from 2017 to be directly included in CIFER so they could keep operating in China

This inclusion needed to be supplemented by the companies updating their data (revalidation) by the end of June 2023. Fail to do would imply their records being erased and new registration needed

However application has been unclear.

For the rest they operate as “new high risk” categories

What is really happening at the ports?

How to make changes?

CONFIDENTIAL

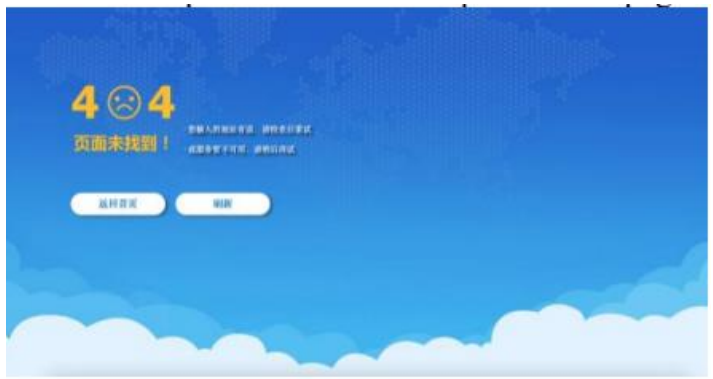
Manufacturer registration. CIFER. **From low to high risk, WITH export record**

2.b

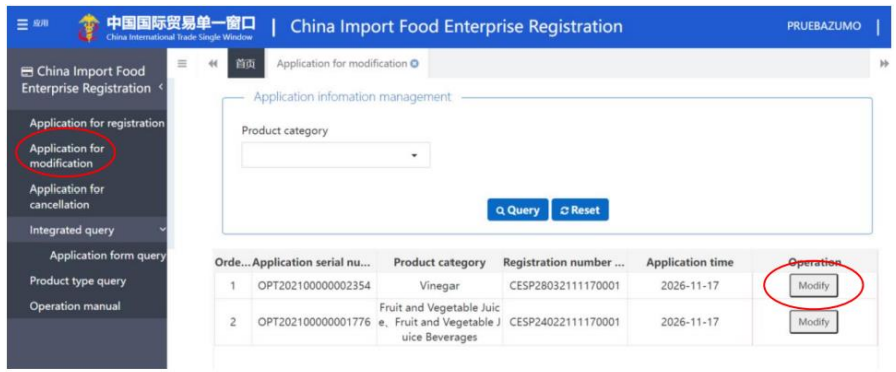
Edible and vegetable oils, as a category that has turned from “low risk” to high risk, **need to be re-verified by GACC**



CEXGAN authorization



After 30/6/2023



Application for modification
https://cifer.singlewindow.cn

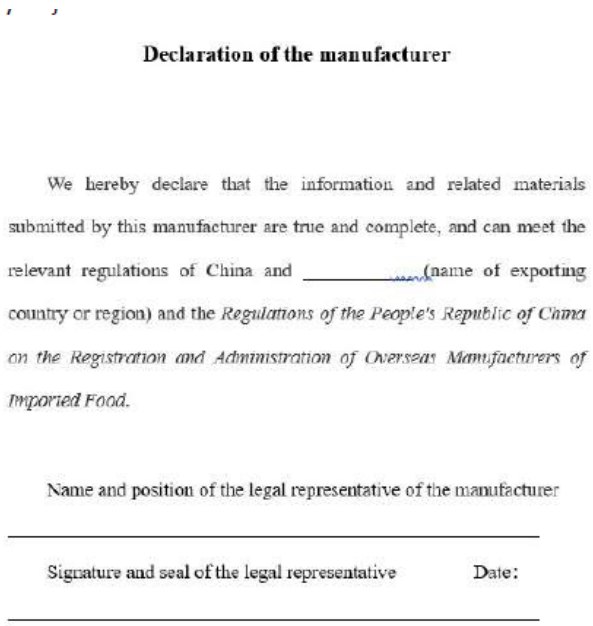
CONFIDENTIAL

Manufacturer registration. CIFER. **From low to high risk, WITH export record**

2.b

Pre-registration in MISAN

Verification / Renovation via CIFER



Declaration of the manufacturer

We hereby declare that the information and related materials submitted by this manufacturer are true and complete, and can meet the relevant regulations of China and _____(name of exporting country or region) and the *Regulations of the People's Republic of China on the Registration and Administration of Overseas Manufacturers of Imported Food.*

Name and position of the legal representative of the manufacturer

_____

Signature and seal of the legal representative Date:

_____

- Basic information (country, legal, registration numbers)
- Health authorization (RGSEAA) translated in english
- Production, processing or storage: HS/CIQ, storage units, risk analysis, photos
- Trade history: with China in the past 2 years, overall exports
- Info about ingredients (certificate OGM, use of pesticides…)
- Other companies in the value chain

DATA must be the same for both sides

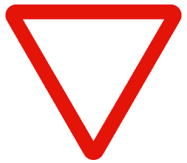
(MISAN) Authorities can revise everything before sending to China customs, and they can submit, refuse, send back and try again

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Manufacturer registration. CIFER. **From low to high risk, WITH export record**

How does it affect me?

5 cases

1.a	High before and high risk now. Never registered	STOP							
1.b	High before and high now. Previously registered Eg, meat	STOP							
2.a	Low risk before but high now. No previous exports. Eg. Olive oil								
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Manufacturer registration. CIFER. **Case studies**

3 different food products allow us to understand how barriers and procedures have evolved after the implementation of Decree 248/249 in China

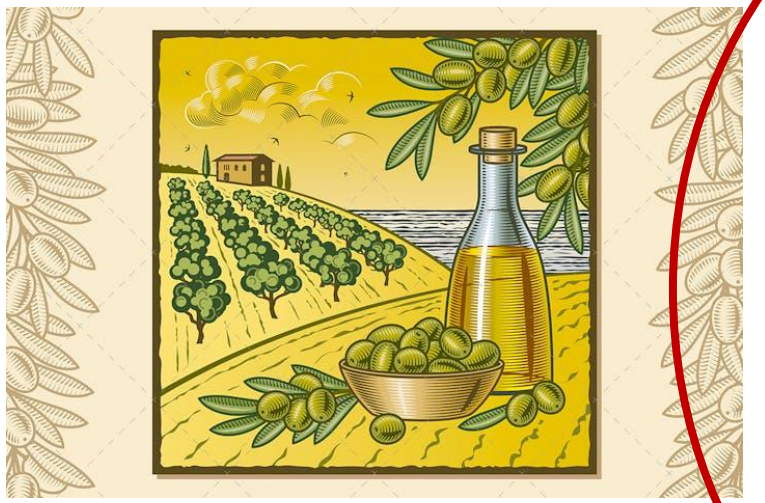
case 1 Meat products



1.a

1.b

case 2 olive oil



2.a

2.b

case 3 wine



3

Manufacturer registration; CIFER. **Low risk** (Article 9 of Decree 248)

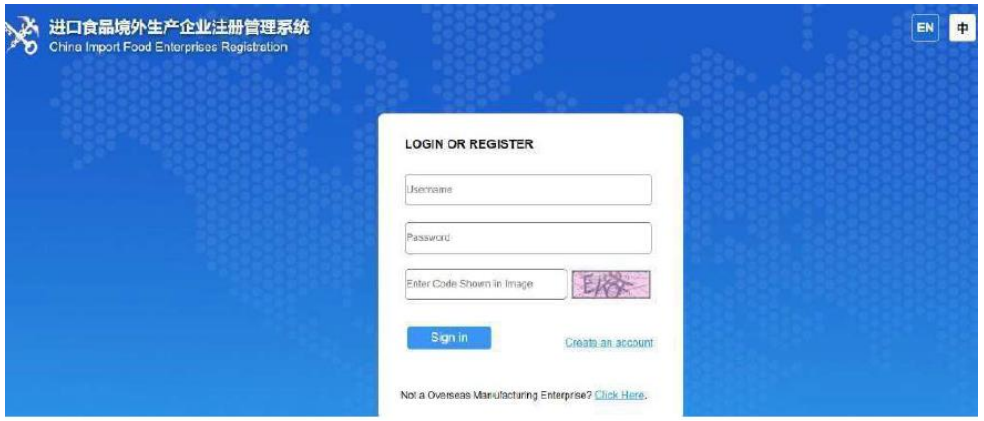
3

Yesterday	Today
low risk	low risk

Before Decree 248, same as olive oil → As a low-risk category, a wine establishment exporting to China should do **(auto) register through CIFER platform**



1. Manufacturer's application for registration
2. Documents certifying the identification of the manufacturer
3. Statement by the manufacturer that it conforms with the requirements of these Regulations.



CONFIDENTIAL

HOW DO I OPERATE THE PLATFORM

CONFIDENTIAL

Manufacturer registration. CIFER. Low risk products **How do I operate the platform?**

Low risk categories like wine must self-register through CIFER

Website www.singlewindow.cn

to check who is register already and details
https://ciferquery.singlewindow.cn/

Register
https://cifer.singlewindow.cn/

Those in need of recommendation of the authorities at origin (high risk)
https://cifer.singlewindow.cn/

Make changes

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Manufacturer registration. CIFER. Low risk products **How do I operate the platform?**

Low risk categories like wine must self-register through CIFER

Before I start, what do I need to know and prepare:

Can somebody do it for me?

Where can I learn more?

In what language can I fill the data?

How about the documents to be upload?

What documents and info do I have to prepare?

What data I cannot change later?

Do I need to do the whole registration in one time?

HS code to check my product category

Website www.singlewindow.cn

To check who is register already and details

https://ciferquery.singlewindow.cn/

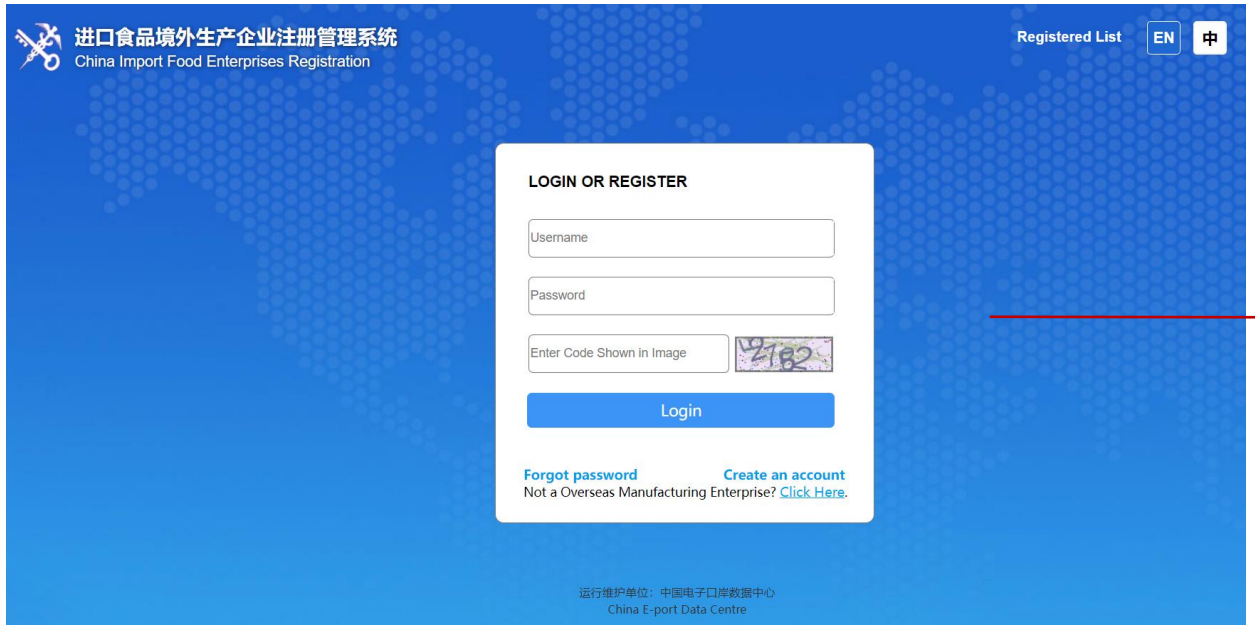
Register

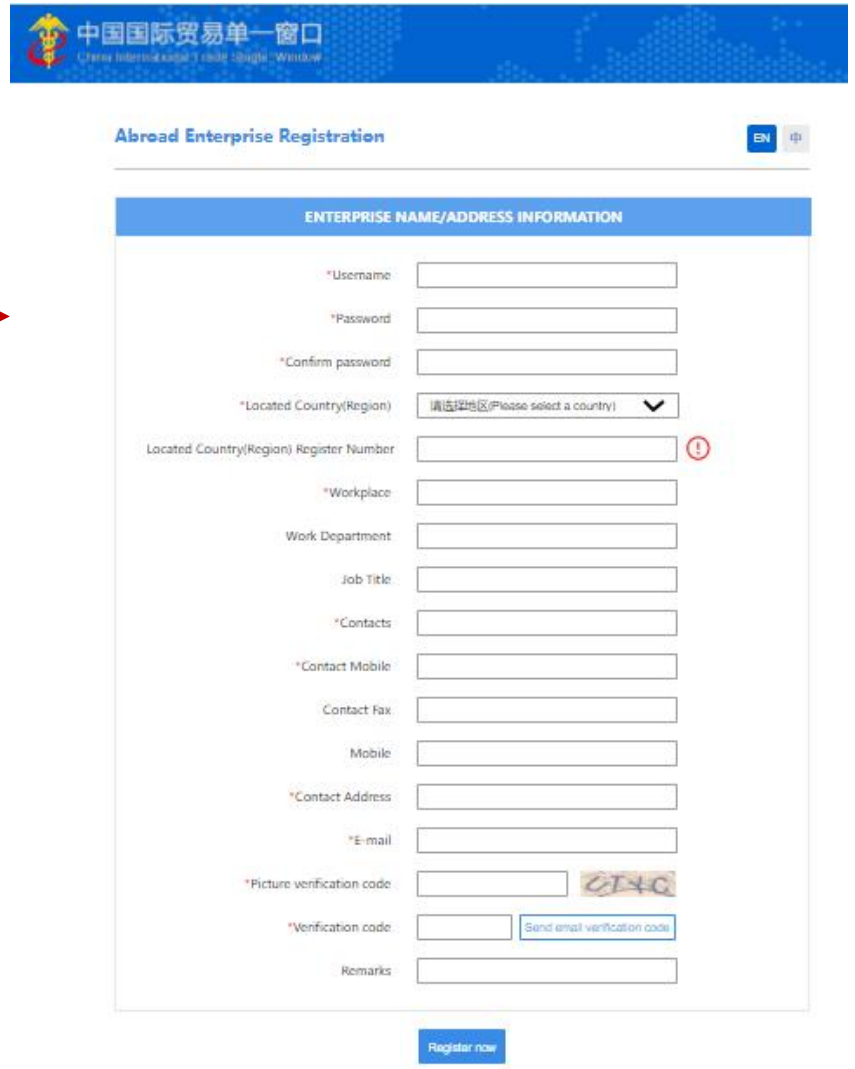
https://cifer.singlewindow.cn/

CONFIDENTIAL

Manufacturer registration; CIFER **How do I operate the platform?**

Low risk categories like wine must self-register through CIFER



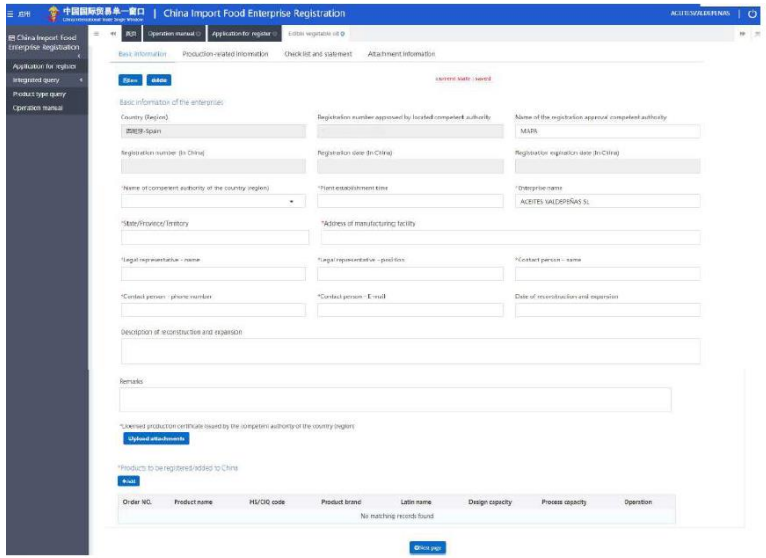


Every company applying for a registration number at the first time should create an account

- All the blanks with red star * and “Located Country (Region) Register Number” are required fields
- For “located country/region”, please choose the abbreviation of the country/region where the company locates, such as “ESP” for Spain

Manufacturer registration; CIFER **How do I operate the platform?**

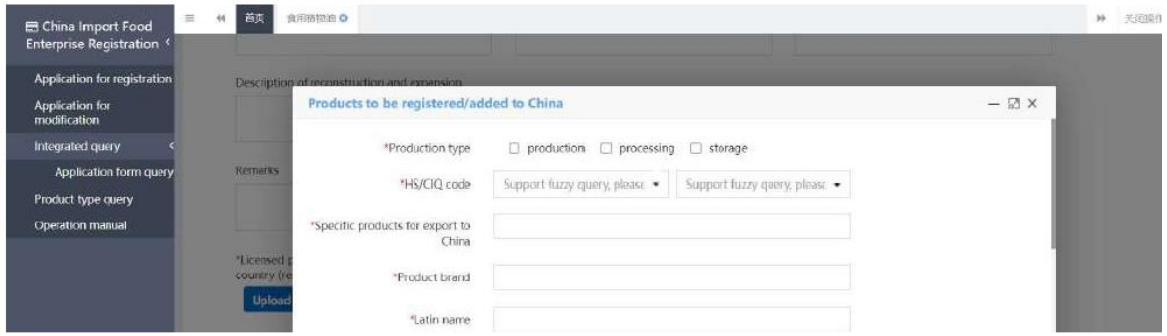
Basic information about the establishment / manufacturer



Photos



Product information (production, storage, processing)

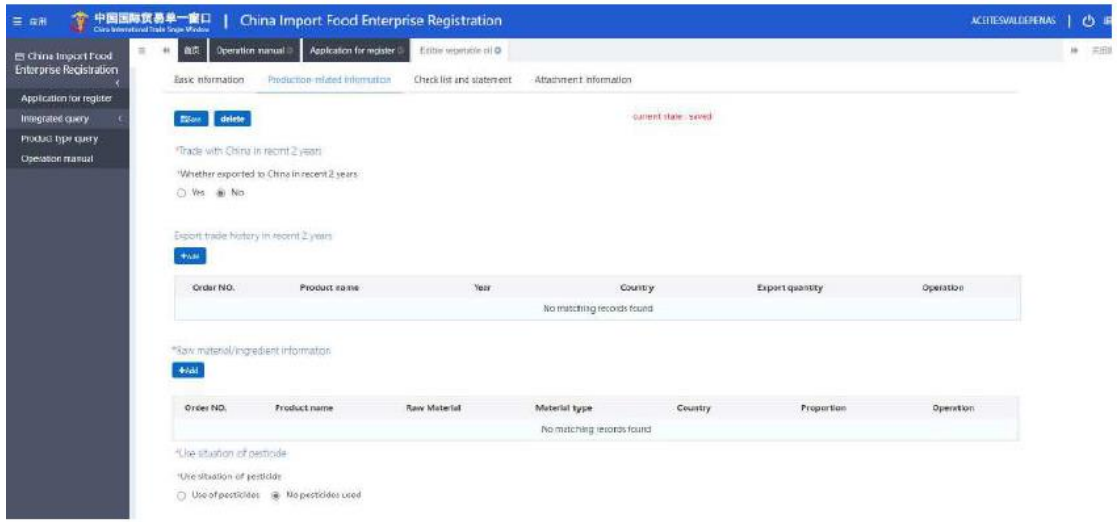


What products are going to be exported

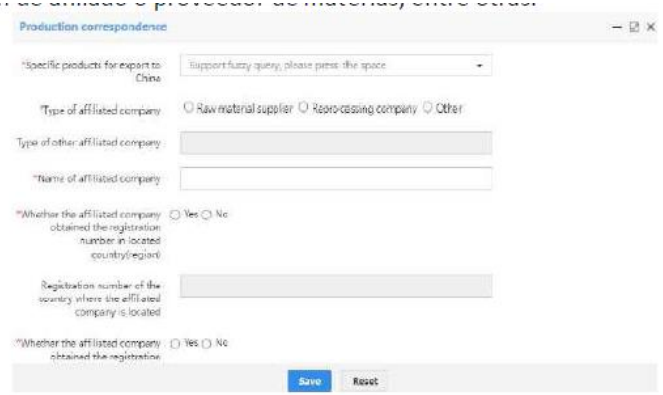


Manufacturer registration; CIFER **How do I operate the platform?**

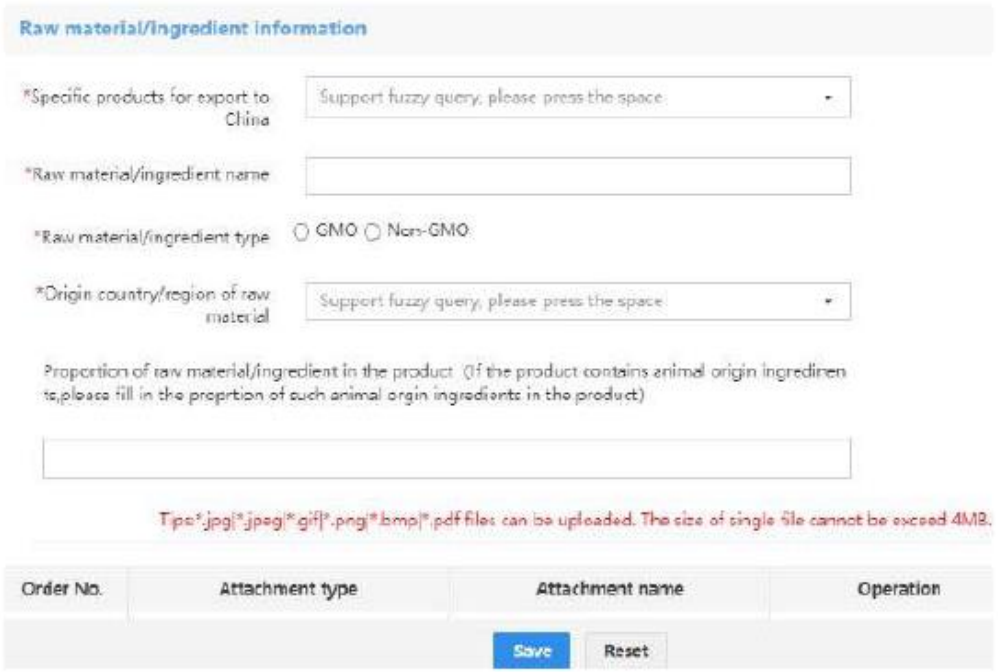
Commerce with China last years; overall exports history



Other companies in the value chain

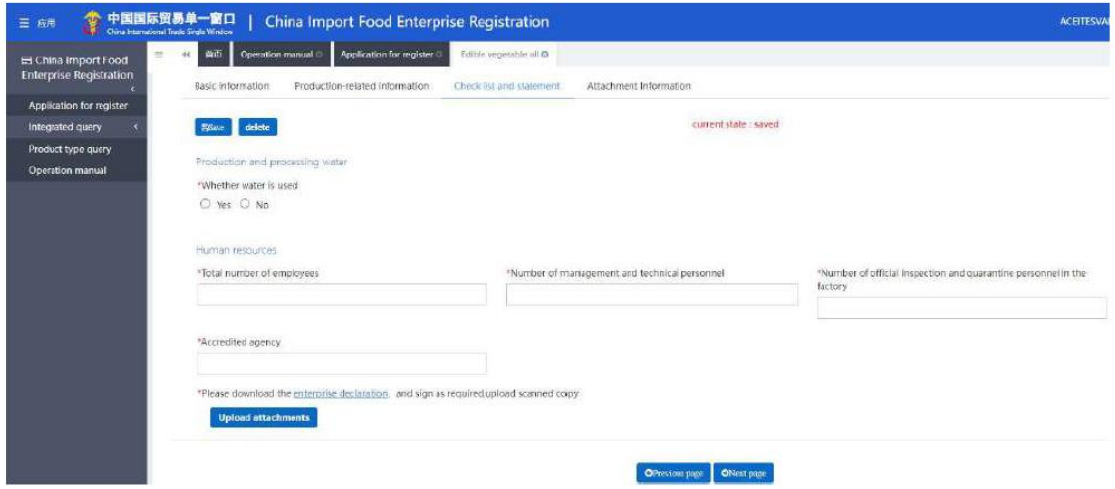


Ingredients (GMO, pesticides)

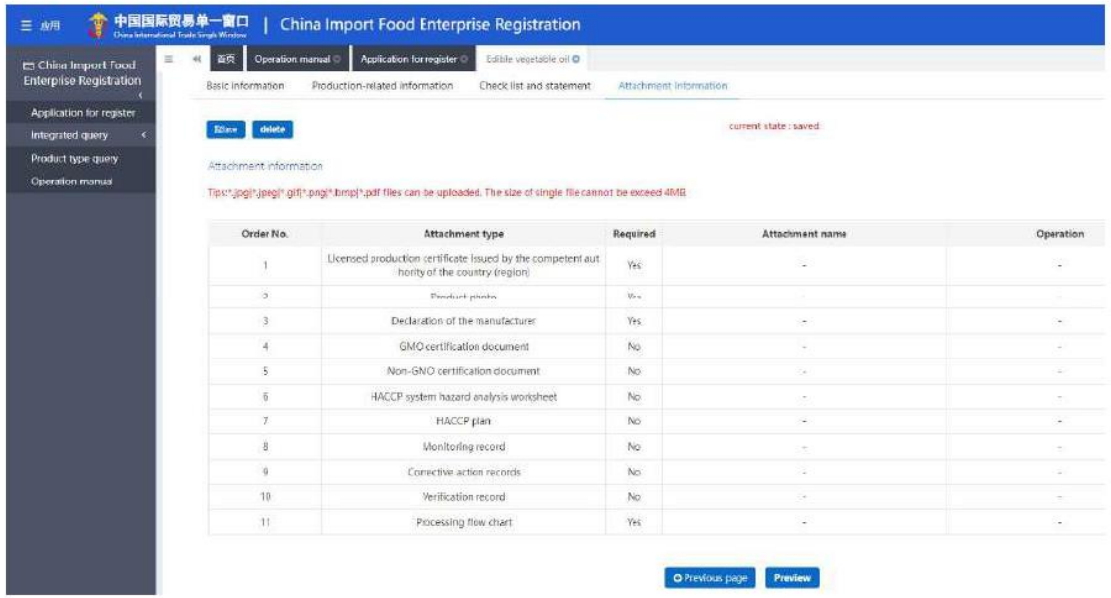


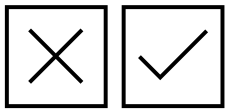
Manufacturer registration; CIFER **How do I operate the platform?**

Declaration and check-list statement



Attachment info





The company cannot modify the data to present themselves for the second time.

However, the company may present a new application for registration

Manufacturer registration. CIFER. Low risk products **How do I operate the platform?**

Low risk categories like wine must self-register through CIFER

Practicalities, Dos and Don’ts:

What is the platform?

How does the platform work from Europe?

Do I need to fill contents without the asterisk?

What to add on the initial registration?

What level of detail?

CIQ code?

Practicalities, Dos and Don’ts:

How do I check it?

How long does it take?

Can they ask for additional information?

Attachments?

How much it costs?

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Manufacturer registration; CIFER **How do I operate the platform?**

A registration number is given by GACC after all procedures are cleared (both high and low risk)

CESP	1701	140430	0001
Country code	*Product category*	*Registration date*	*Serial number*

The system does not notify when the Chinese authorities have given a registration number.

You can only know using periodic consultation through the user account

https://ciferquery.singlewindow.cn/

Manufacturer registration. CIFER. Low risk products **How do I operate the platform?**

Low risk categories like wine must self-register through CIFER

After the submission:

How do I check the status?

Possible status

What can I change or not change?

Can I change during the review process?

How do I change data?

Validity

Extension

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Manufacturer registration. CIFER. Low risk products **How do I operate the platform?**

Low risk categories like wine must self-register through CIFER

Examples and FAQs

Product produce along a supply chain of several companies?

Different centers of the same company?

Multiple suppliers?

Product already at port?

Timing?

Labelling

CONFIDENTIAL

CONTENT

1 Protocols and company listings

2 Manufacturer Registration; CIFER

3 Exporter Registration

4 Labelling

5 IP Protection. Trademarks

Exporter's registration

Besides CIFER, the **exporter's registration is still needed.** It is a fast process if connectin and browser work



http://ire.customs.gov.cn/

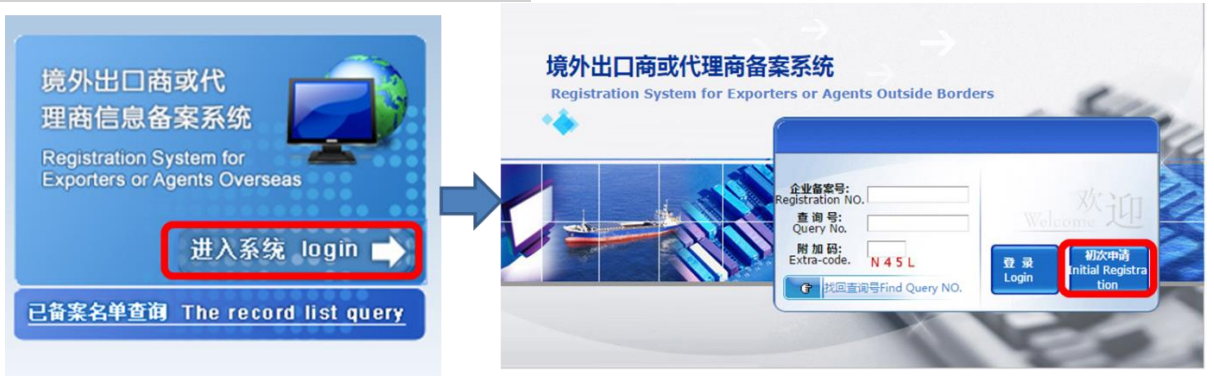
http://ire.customs.gov.cn/#

Exporter's registration

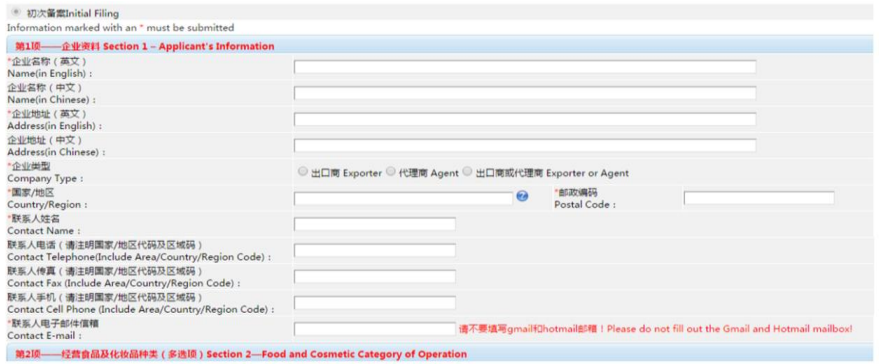
Besides CIFER, the **exporter's registration is still needed.** It is a fast process if connectin and browser work

Online registration in AQSIQ

1. Click "login" and then "initial registration"



2. Information section



You will receive a system message with the filling and query number. These two numbers are used to login, in order to record change, cancel your registration, enquiries, etc

CONTENT

1 Protocols and company listings

2 Manufacturer Registration; CIFER

3 Exporter Registration

4 Labelling

5 IP Protection. Trademarks

Labelling

Decree 248 also signified a different approach on how to label and register your trademark

*"A registered manufacturer shall mark the Chinese registration number, or the registration number approved by the competent authority of the country/region on the **inner and outer packaging** of the foods exported to China. "*

- Chinese code must be on the packaging and labels. Easily identified and recognizable by consumers

- Inner packaging refers to the packaging of the minimal sales unit of the product, outer packaging is the external pack used for transportation to China

Other general requirements

- ✓ Product name, specification, net content, production date
- ✓ Table of ingredients or formulation
- ✓ Name, address, contact details of manufacturer/ distributor
- ✓ Shelf life, production/expiration date
- ✓ Code of product standard
- ✓ Storage requirements
- ✓ **Registration code from GACC**
- ✓ Warning of allergens

Standard in English	Standard in Chinese	Standard Number	Effective Date
General Principles for the Labelling of Pre-packaged Foods	预包装食品标签通则	GB7718-2011	20/04/2012
Standard for Nutrition Labelling of Pre-packaged Foods	预包装食品营养标签通则	GB28050-2011	01/01/2013
Labelling of Pre-packaged Foods for Special Dietary Uses	预包装特殊膳食用食品标签	GB13432-2013	01/05/2015
General Standard for the Labelling of Food Additives	食品添加剂标识通则	GB29924-2013	01/06/2015

Translations for pre-packed (from EU SME center)

CONFIDENTIAL

Labelling

There are requirements that vary depending on the food category

MEAT PRODUCTS

Products listed under high-risk of Decree 248 can use either a GACC-issued registration number or the registration number issued by the overseas competent authority on the label.

Inner
- Country of origin
- Product name
- Manufacturer number
- Production batch

Outer
- Specifications
- Province, city
- Destination country
- Date of prod.
- Shelf life
- Storage temp
- Official inspection and quarantine mark



WINE

For low-risk products you should use the number you entered when completing the self-registration process, for example, ABN, ACN or unique identifying number for your business.



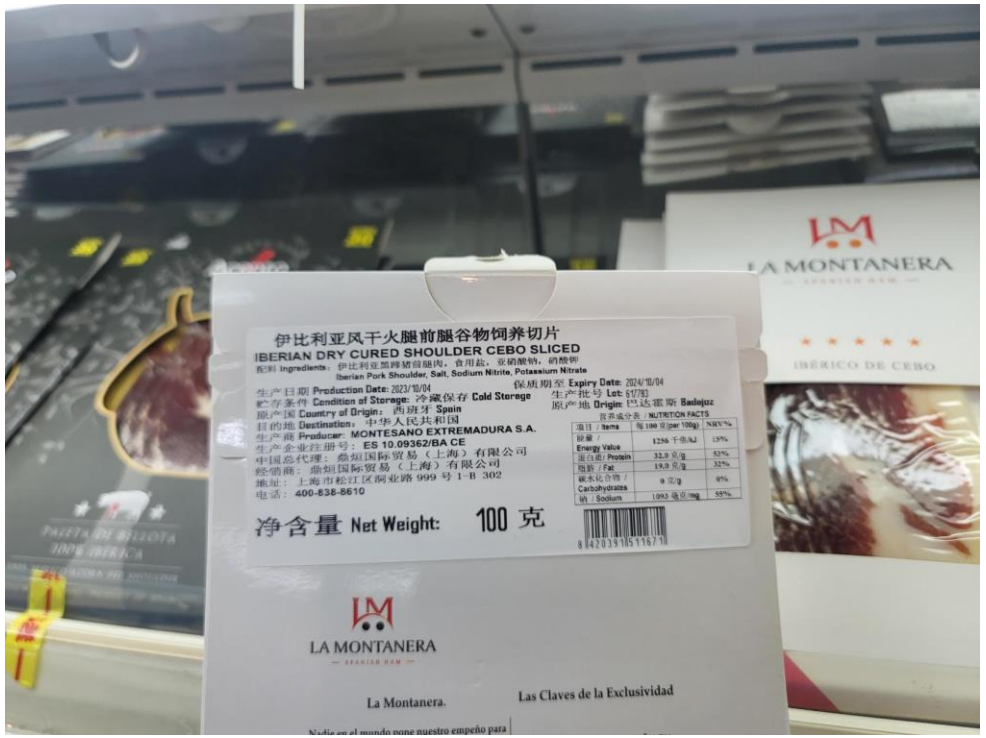
Labelling

Label or sticker?

Two options

Sticker

- ✓ Frequent change of importers
- ✓ Small volumen of sales



Packaging adaptation

- ✓ Stable importers
- ✓ Big volume of sales



It's not enough to translate the label contents, you need to adapt it to the regulations

Labelling

Label translation and **original flat design**

GACC will require a flat design of the label with Chinese translations of ALL the text in it.



CONTENT

1 Protocols and company listings

2 Manufacturer Registration; CIFER

3 Exporter Registration

4 Labelling

5 IP Protection. Trademarks

IP Protection. Trademarks

Protect your brand: Registering your trademark in China should be the first step before taking any commercial actions in the market.

- Specific for Mainland China / Hong Kong / Macau / Taiwan.
- System first-to-file. Start before having any contact with China.
- Protects categories. E.g.: wine is classified under Class 33: “Alcoholic beverages (except beers); alcoholic wines; spirits and liqueurs; alcopops; alcoholic cocktails.”
- Process takes up to 12-18 months.
- Cost: around 1.000 euros
- Under your own name. Do not leave it to your importer
- Adapt Chinese name and include B/W logo
- Be careful with new brands and products presented at trade exhibitions, website, brochures…
- Seek support

CHINA IPR SME HELPDESK

IP Protection. Trademarks

Pre-Application Trademark Search	5 days	Check if the Trademark is already registered Compilation of documents and payments
Formal examination	4 months	CTMO checks that the formal requirements are fulfilled, and the application form is properly filled out. Once completed, CTMO issues the "Trademark Notification of Acceptance"
Substantial Examination	9 months	This is the actual examination carried out by CTMO. If the trademark is in compliance with the law, CTMO will publish the preliminary approval.
Opposition period	3 months	If there is no opposition, CTMO issues the "Certificate of Trademark Registration", valid for 10 years.

TOTAL TIME: AROUND 16 MONTHS BUT...

Apply from Europe or China?

Prodeca
Promotora dels aliments catalans

Generalitat
de Catalunya