

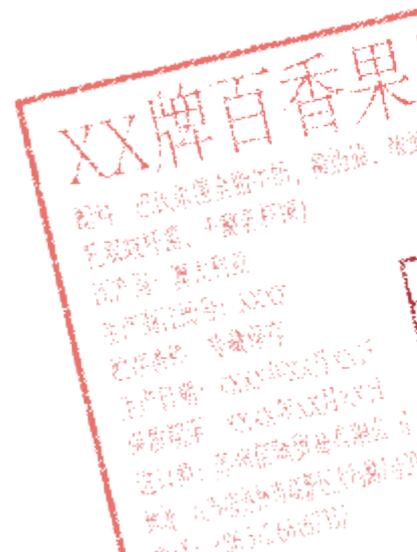
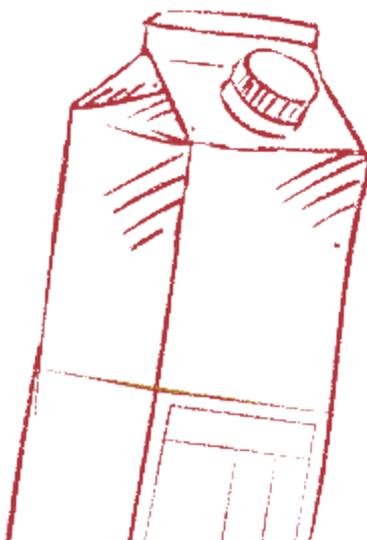
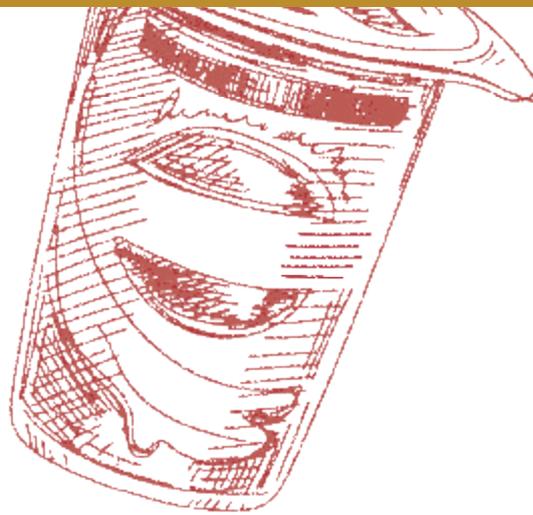


AUSTRALIAN  
**FOOD &  
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COUNCIL

# Food and Beverage Labelling Guide for Exports to China

February 2021

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**Food and Beverage Labelling Guide for Exports to China**

**Australian Food and Grocery Council**

February 2021

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# 1. ACKNOWLEDGEMENT AND DISCLAIMER

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This report was prepared for the Australian Food and Grocery Council (AFGC) by Peloris Global Sourcing Pty Ltd (PGS), through funding provided by the Commonwealth of Australia's Department of Agriculture, Water and the Environment (DAWE) under the Australia–China Agricultural Cooperation Agreement (ACACA).

AFGC acknowledges the help and contribution of DAWE in compiling this extensive report. AFGC would also like to thank the China Chamber of Commerce of Import and Export of Foodstuffs, Native Produce and Animal By-Products (CFNA) for their inputs.

The report contains general information only. The AFGC is not, by means of this publication, rendering business, financial, investment, trade, legal, tax or other professional advice. Professional advice should be sought independently, including advice on regulatory requirements of exporting to and selling food and groceries in China. This Guide is not intended to replace or override existing regulations and supporting documents such as the China National Food Standards (GB Standards) or the Australian Manual of Importing Country Requirements (MCoR). Exporters should always reference source documents and data directly to ensure access to the most timely and relevant information.

The AFGC will not be held responsible for loss or damages sustained by any person or entity relying on the information in this publication. No part of this publication may be reproduced in any manner or form without written permission from the AFGC.



**Australian Government**  
**Department of Agriculture,  
Water and the Environment**



# 2. ABOUT THE AUTHORS

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PGS are respected consultants specialising in China market compliance services, including product labelling and import clearance. AFGC has previously collaborated with PGS to develop a food and beverage [China Market Industry Guide](#) in 2018/19.

To deliver this project PGS has worked in collaboration with [CFNA](#), which is an industry body in China comprising more than 6500 members companies involved in the import and/or export of all agricultural, forestry, food and farm products. PGS is an executive member of CFNA.

## 3. CEO FOREWORD

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The COVID-19 pandemic has highlighted both the importance and potential vulnerabilities of global food supply chains. The crisis has reinforced the importance of agriculture, availability of food ingredients and resilience of the food trade in maintaining food security for consumers at home and abroad.

The China–Australia Free Trade Agreement (ChAFTA) signed in 2015 has greatly facilitated closer trade relations and helped develop trade opportunities for both countries. China is now Australia’s largest food export destination and continues to be an important growth market.

This *Food and Beverage Labelling Guide for Exports to China* (Guide) serves as a tool for Australian food and beverage exporters to help understand and navigate the requirements for securing China label and regulatory compliance for their goods.

As this guide illustrates, China’s food labelling laws have been designed to protect the health and wellbeing of consumers by ensuring clear and unambiguous food labelling content, messaging and formatting. Through a greater understanding of the principles underlying these regulations, exporters will be better equipped to meet China’s label requirements.

A handwritten signature in black ink that reads "Barden".

**Tanya Barden**

AFGC CEO





# 4. Introduction

- 4.1 Trade with China
- 4.2 Guide Objectives
- 4.3 Methodology and Scope

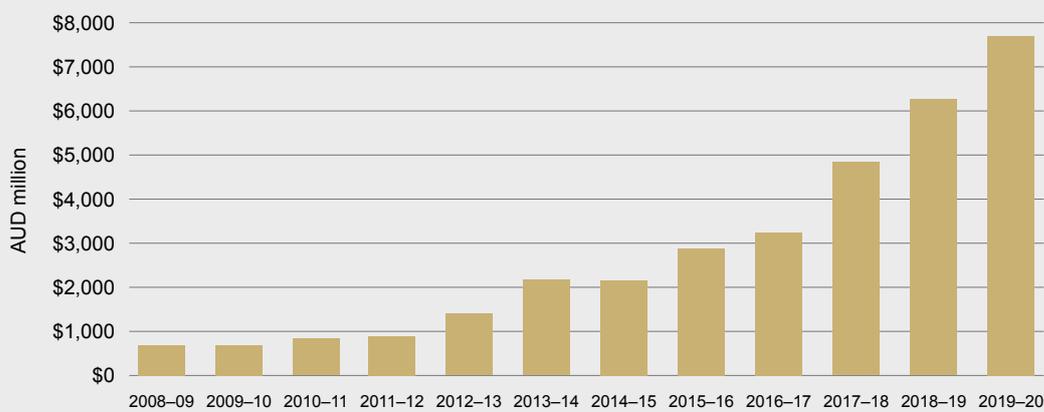
# 4. INTRODUCTION

## 4.1 TRADE WITH CHINA

China is Australia’s largest export destination for food and grocery sector, recording exports of \$11.0 billion in 2019-20. The food and non-alcoholic beverages product manufacturing sub-sector accounted for 69.8% (\$7.7 billion) of total food and grocery sector export. The sub-sector has recorded significant export growth rate, and this trend is expected to continue, driven by rising income levels and the evolving tastes of Chinese consumers.

**FIGURE 1 – Food and non-alcoholic beverage product manufacturing exports to China**

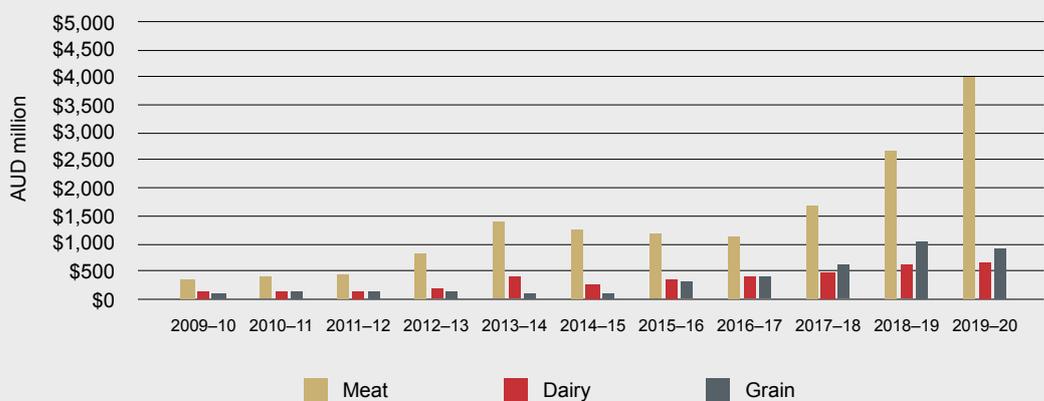
Source: Australian Bureau of Statistics



Meat, grain and dairy product exports accounted for 78.2% of the total food and non-alcoholic exports in 2019–20

**FIGURE 2 – Product manufacturing industry exports**

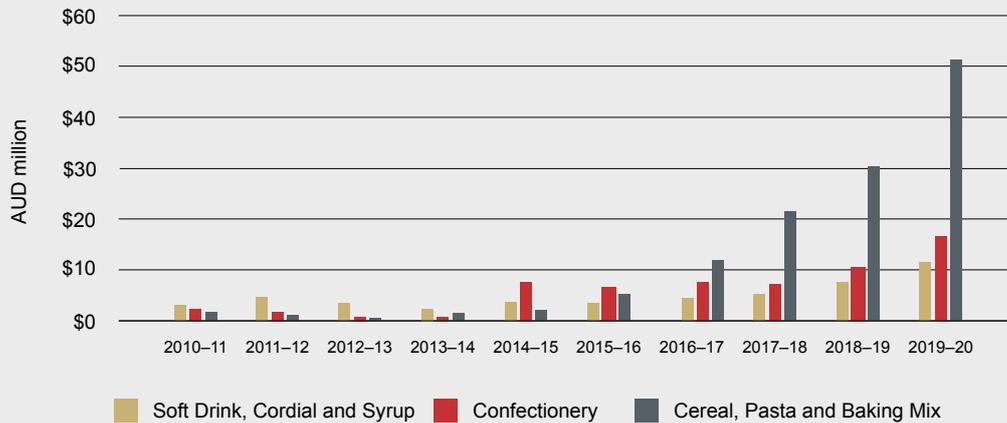
Source: Australian Bureau of Statistics



Consumer demand for a broader range of quality Australian prepackaged foods has also been increasing, particularly over the past five years. Cereals, pasta and baking mix manufacturing has experienced a 3-year CAGR of over 60% despite the adverse impact of the pandemic on consumer spending and international supply chains during the second half of 2019–20.

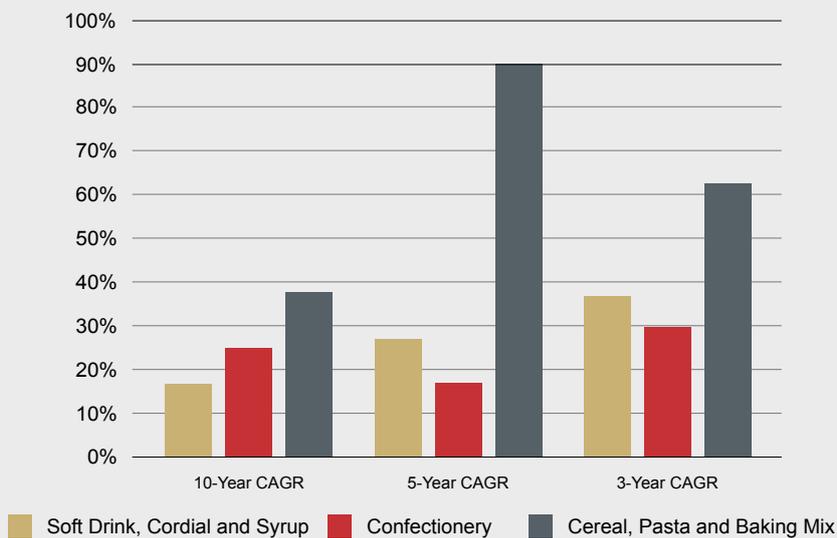
**Examples of Australian prepackaged food category export growth**

**FIGURE 3 – Food product manufacturing exports to China**



**FIGURE 4 – Compound average growth rate**

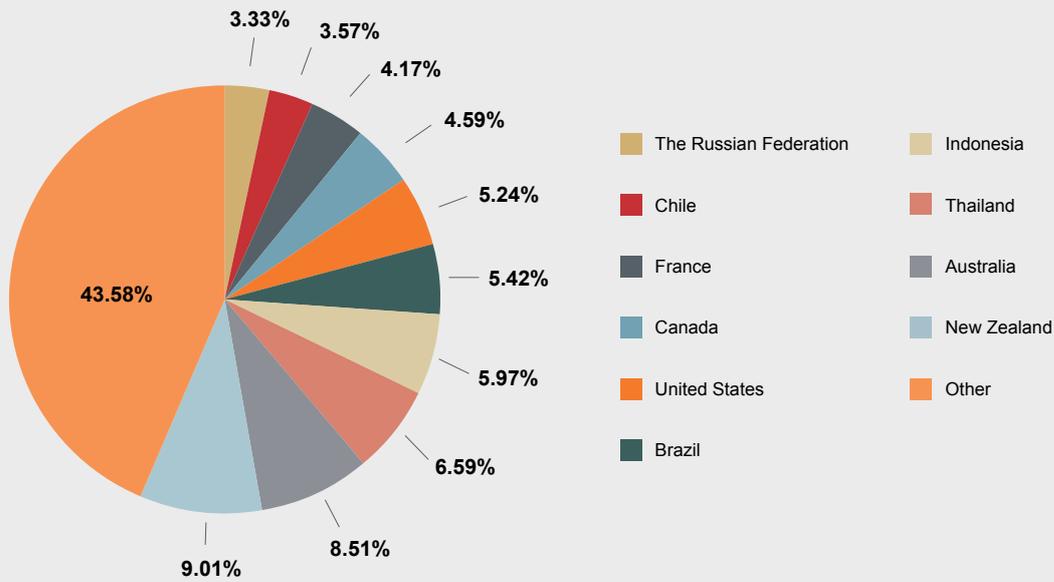
Source: Australian Bureau of Statistics



While Australian food is well regarded by Chinese consumers for its high quality and safety, exporters must vie with countries from around the world for a share of this extraordinary market opportunity. In 2019 China imported food from over 180 countries, with Australia’s total share of imported value being 8.51%.

**FIGURE 5 – Shares in Food Import Value by Import Origin, 2019**

Source: CFNA 2019 Food Import Report



One of the key challenges facing Australian exporters is managing compliance with China’s food labelling regulations. These regulations have been implemented to protect the interests of Chinese consumers and are both rigorous and technically complex.

General Administration of Customs of the People’s Republic of China (GACC) regularly publishes a [‘Blacklist’](#) of food import shipment rejections. Analysis of this list highlights that non-compliant product labelling is one of the leading reasons for shipment failures. It is therefore essential for exporters to understand and comply with these regulations, which will enable them to secure market access for their prepackaged foods and beverages.



## 4.2 GUIDE OBJECTIVES

This Guide seeks to inform Australian exporters and producers (hereafter referred to as 'exporters') of the labelling requirements for prepackaged foods and non-alcoholic beverages. The Guide provides an overview of the relevant Chinese food safety laws, regulations and standards. It cross-references the source documents, to help exporters validate the information, and provides illustrations, case studies, 'watch outs' and frequently asked questions.

It is hoped that this Guide can provide Australian exporters with a greater awareness and understanding of both the technical criteria and the rationale behind China's imported food labelling laws. This can also assist exporters in working with their trade partners in China to ensure full market compliance for their exports.

## 4.3 METHODOLOGY AND SCOPE

The Guide has been developed in collaboration with CFNA to ensure a common understanding of prepackaged food import labelling requirements and has been aligned with a labelling resource developed by the CFNA for its members.

Australian industry consultation was undertaken and the feedback incorporated into the Guide. Case studies and the Frequently Asked Questions included in the Guide have been based on common challenges faced by Australian exporters.

The scope of this Guide is restricted to China label compliance for prepackaged foods imported via the 'general trade' or the 'cross-border e-commerce' (CBEC) import pathways. Food imports via the 'Daigou' ('shop on behalf of') or personal post pathways are not addressed.

In producing this Guide, the authors have referenced the following sources:

- China Food Safety Law (2015)
- China E-commerce Law (2019)
- GB7718-2011: General Rules for the Labelling of Prepackaged Foods
- GB13432-2013: Special Rules for the Labelling of Prepackaged Foods
- GB28050-2013: Prepackaged Special Dietary Foods
- Concise Handbook of Chinese Laws and Regulations on the Admittance of Imported Foods (2020)





# 5. Overview: China's Food Safety Laws

- 5.1 Food Safety Law of the People's Republic of China
- 5.2 E-Commerce Law of The People's Republic of China
- 5.3 China's Food Safety Regulatory System
- 5.4 China's Food Safety Standards
- 5.5 Enforcement of Penalties for Non-Compliance

## 5. OVERVIEW: CHINA FOOD SAFETY LAWS

In recent years, a complete set of food safety laws, regulations and rules has been implemented in China, to provide a comprehensive, coordinated and unified food safety legal system. These are led by the GACC and implemented by local customs at regional and port level.

The most important law, for exporters using the general trade import pathway, is the *Food Safety Law of the People's Republic of China (2015)*. For exporters considering the cross-border e-commerce (CBEC) import pathway, the *E-commerce Law of the People's Republic of China (2019)* will apply. These laws provide a regulatory framework for all aspects of food safety.

### 5.1 FOOD SAFETY LAW OF THE PEOPLE'S REPUBLIC OF CHINA (2015)

When the *Food Safety Law of the People's Republic of China* – henceforth referred to as the China Food Safety Law – was introduced in May 2015, it was described at the time as the strictest food safety law in Chinese history. It reflected the proactive attitude of the Chinese government in cracking down on several prior food scandals that had resulted in poor consumer confidence in domestically produced goods and a wariness about the provenance of imported foods.

This law also considers recent types of food trading activities, including food sold on third-party trading platforms and food imported through e-commerce channels, although these activities have subsequently been addressed more specifically in the China E-commerce Law that came into effect on 1 January 2019.

#### Chapter 1: General Principles

The ten chapters and 154 articles detailed in the China Food Safety Law address the responsibilities and obligations of the regulatory agencies in providing unified food safety supervision, and establishes a scientific management system based on food safety risk monitoring and evaluation.

The law explicitly states that food exporters and traders are jointly responsible for food production and trading activities. This responsibility has been defined as 'following the relevant laws, regulations and food standards in their operations, ensuring food safety, acting honestly and in good faith, assuming social responsibilities, and accepting public oversight' (see Article 4, China Food Safety Law).

Exporters therefore need to be cognisant of the fact that responsibility for food import compliance (of which label compliance is a major factor) cannot be simply transferred along with product ownership. While exporters may not be legally exposed, they may be at risk of significant financial loss due to rejected shipments, damage to their brand reputation and loss of market access.

#### Chapter 2: Food Safety Risk Surveillance and Assessment

Chapter 2 details the requirements of food safety risk surveillance and assessment systems to monitor and prevent foodborne diseases, food contamination and other food-related hazards. While this is not directly relevant to product label compliance, exporters should familiarise themselves with information as it pertains to ensuring product ingredient compliance.

#### Chapter 3: Food Safety Standards

The primary objective of China's national Guobiao food safety standards (GB Standards) is to safeguard public health. These national food safety standards are mandatory and take precedence over any existing industry or enterprise standards.

The three GB standards relating to food labelling of prepackaged foods are explained later in this Guide. However, exporters should familiarise themselves with the overarching food safety laws as they pertain to food ingredients, formulation and testing criteria. If these elements are not compliant, then the product label itself will not be compliant.

GB standards details can be found [here](#).

## Chapter 4: Food Production and Trading

The general provisions of this chapter outline the food production systems, trading standards and compliance requirements applicable to food exporters and traders. These apply equally to both domestic production and imported food and include the mandatory requirements for the Chinese trading companies.

It is worthwhile noting that Article 42 of the China Food Safety Law requires food exporters and traders to establish and maintain a food traceability system that covers the full supply chain with the capability to manage product recalls. There are now a number of food traceability systems in the market that can assist exporters in providing the required level of visibility. Food traceability is further discussed in the Frequently Asked Questions section of this Guide.

### *Section 3: Product Labelling*

The law requires all prepackaged food to be appropriately labelled with prescribed product ingredient and manufacturing information. Article 67 of the China Food Safety Law provides a list of the information required. However, exporters should note that certain food categories may require additional information. If the relevant GB Standard(s) sets additional or alternative requirements for a particular food category label, such requirements must be followed.

The law clearly states that food packaging labels must not contain false or unverifiable statements or information. Exporters and their trading partners are responsible for the authenticity and verifiability of any declarations on the label. For example, health food benefit claims must have a scientific basis, food promotion and advertising must provide truthful and verifiable information, and the label cannot claim any disease prevention or treatment functions that cannot be verified.

China's regulatory interpretation of label and advertising claims (e.g. 'market leading', 'award winning') is very literal and such claims must be verifiable. Exporters and their trading partners are also responsible for the authenticity and legality of any advertising of their food products in the Chinese market, and therefore it is prudent to have full visibility of how the brand is being promoted to avoid breaches of China's advertising laws.

## Chapter 5 Food Inspection

Chapter 5 outlines food testing responsibilities, practices and procedures for exporters. Sampling and testing guidelines are explained in Article 85 of the China Food Safety Law. In cases of disputed results, exporters and traders can appeal the original test report and request a retest.



## Chapter 6: Food Import and Export

This chapter confirms the role of the GACC in regulating the safety of food imports and exports and their role in inspecting imported food, food additives and labels for compliance with the relevant laws and administrative regulations.

Importers are required to establish and maintain an assessment and verification system of overseas exporters to ensure full compliance of food imports. Should the importer become aware of any imported foods (or labels) failing to comply with China national food standards they are obligated to immediately stop these imports and recall the products, if necessary. Exporters should take note that this importer obligation also applies to out-of-shelf-life products.

Exporters and importers involved in the shipment of food to China must be registered with the GACC. Registered overseas food exporters, if providing false material, or responsible for serious food incidents, will be removed from the registration list by the GACC, and the removal will be announced by public notice.

The GACC regularly publishes lists of exporters, importers and overseas food producers who have been recorded or registered for export. Likewise, the GACC regularly publishes the list of import non-compliances via the [Blacklist](#). Label non-compliance is one of the leading causes of import shipment failures.

Article 97 of the China Food Safety Law reiterates the requirement for imported prepackaged food and food additives to have Chinese labels (and usage instructions, if provided).

## Chapter 7: Handling of Food Safety Incidents

Chapter 7 details the roles, responsibilities and procedures for the handling of food safety incidents. Exporters and their China trading partners are required to develop a response plan for food safety incidents, regularly inspect the implementation of preventative measures related to food safety, and address potential food safety risks in a timely manner.

## Chapter 8: Regulatory Work

This chapter outlines the procedures to be adhered to by the various regulatory authorities for the enforcement of the China Food Safety Law and for the supervision of exporters, importers and traders. This includes procedures to be followed for field inspections and audits, document validation, handling and disposal of foods proven to violate food safety standards, and suspension of illegal production or trading of food.

## Chapter 9: Legal Liabilities

Legal liabilities and penalties for breaches of the China Food Safety Law are detailed in this chapter. The key takeaways from this section are:

1. any gains made through the illegal use of food and/or food additives can be confiscated, and
2. illegally produced or traded foods and/or food additives are subject to a range of fines and possible license suspension.

It should be noted that consumers purchasing foods through third-party online food trading platforms can take civil action to secure compensation from both the platform operator and the exporter, if their legitimate rights are impacted. This has now been specifically addressed in the China E-commerce Law (2019) (see section 5.2).

Consumers can also take civil action to seek compensation from traders and/or exporters for harm caused by food that does not meet food safety or product labelling standards. If the exporter is liable, the trader, after compensating the consumer, can request recovery of the compensation from the exporter.

This does not apply to errors in food label and product descriptions which do not affect food safety or mislead customers.

## Chapter 10: Supplementary Provisions

This chapter clarifies the terms used in this law for the benefit of the reader.

## 5.2 E-COMMERCE LAW OF THE PEOPLE'S REPUBLIC OF CHINA (2019)

On 31 August 2018, China's legislative body passed the *E-Commerce Law of the People's Republic of China*, henceforth referred to as the China E-commerce Law, the country's first e-commerce law to 'protect the legal rights of all parties' and 'maintain the market order'. This law came into effect on 1 January 2019.

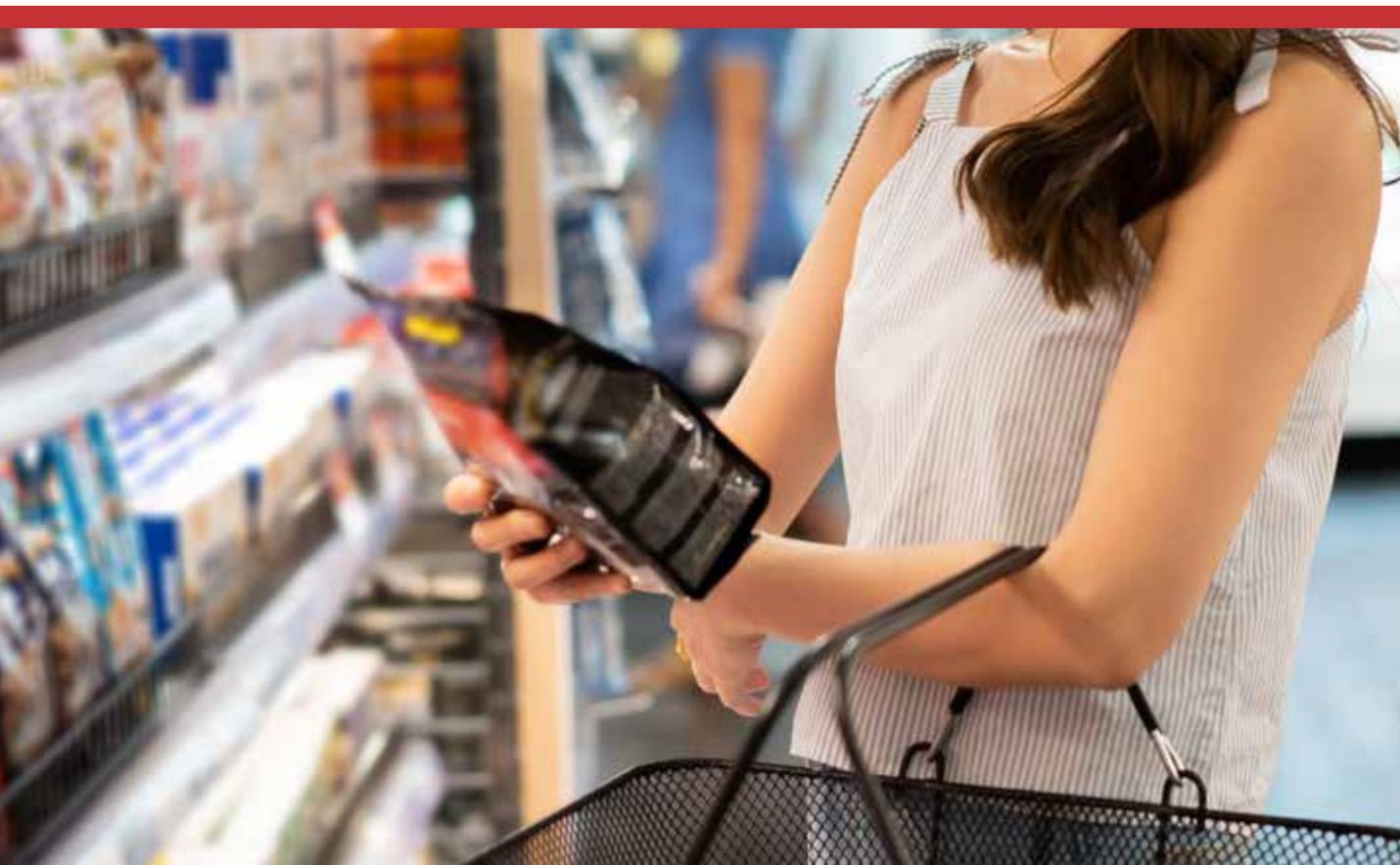
This law focuses on consumers' privacy and rights while at the same time putting more emphasis on the obligations and responsibilities of the e-commerce platforms. For example, the law requires China e-commerce platform operators to guarantee consumer rights are protected in online business transactions. The platform operators must now share responsibility, along with the e-commerce dealer (that is, the merchant), for sales of substandard and counterfeit products. Previously e-commerce dealers were solely liable for any counterfeit products distributed via the online platforms.

The Chinese government's objective is to support e-commerce development, while ensuring its convergence with other trade channels. To ensure this convergence on tax collection, for example, the law requires platform operators to validate the business license and authentication of individual web shops on their platform, and to convey this information to the Chinese tax authorities. This means that e-commerce dealers are required to pay taxes on their e-commerce revenue, especially for individual web shops.

E-commerce dealers are now required to register as a business before engaging in 'the commercial activities of selling commodities or providing services through the internet or any other information platform'.

Article 38 of the China E-commerce Law places responsibility on the e-commerce platform operators to validate e-commerce dealer business registration and product compliance with other relevant China food health and safety regulations.

Article 41 states that responsibility for the protection of intellectual property rests with the e-commerce platform operator. This is an important point, given the prevalence of counterfeit brands and food fraud often associated with e-commerce transactions. If an exporter believes their intellectual property rights have been infringed (e.g. their label copied), they have the right to notify the e-commerce platform operator to take necessary measures such as deleting, shielding, disconnecting or terminating transactions and services.

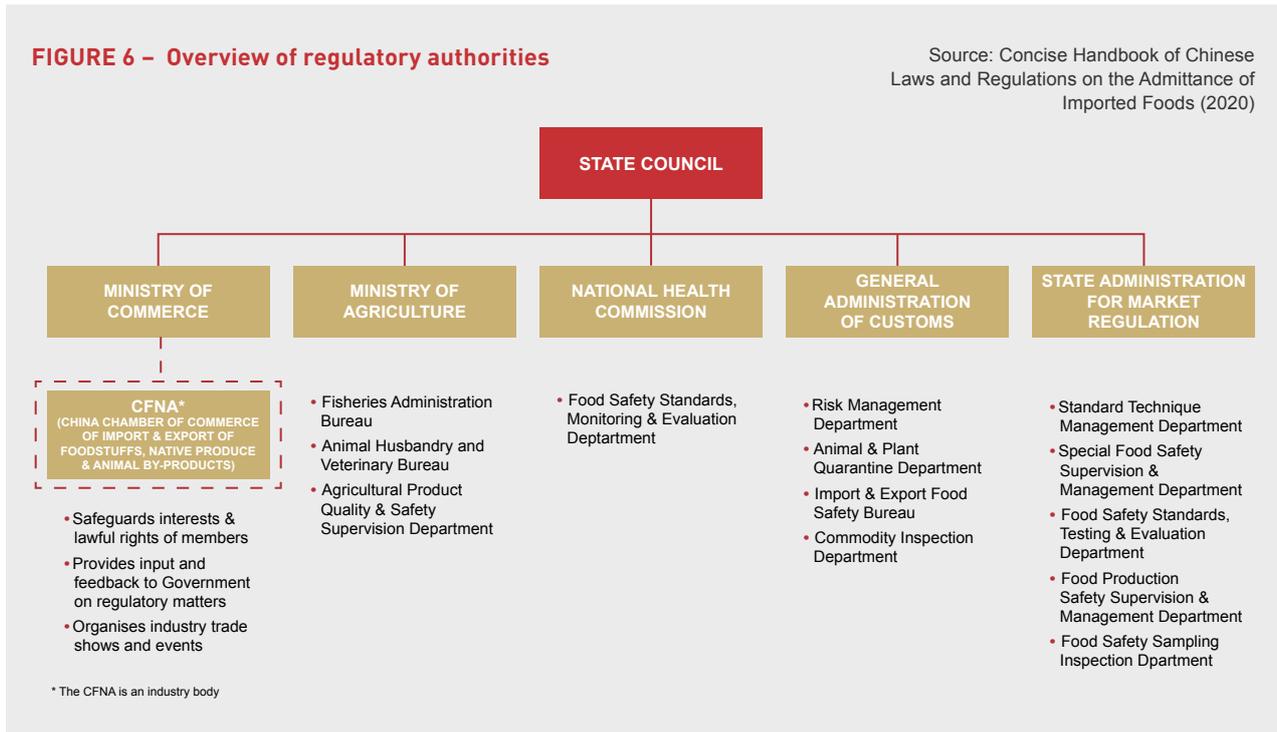


### 5.3 CHINA'S FOOD SAFETY REGULATORY SYSTEM

China's current food safety regulatory system falls under the authority of the 'Ministries of the State Council' and the 'Departments of the State Council'.

The Ministries of the State Council are responsible for policy development, safety standards, audits and accreditations, whereas the Departments of the State Council are responsible for the implementation, management and oversight of the various policies, procedures and practices.

The central authorities involved in food supervision are outlined in the following diagram.



### 5.4 CHINA'S FOOD SAFETY STANDARDS

China's food standards are the sum of all types of standards within the food industry. They are divided into national standards, industry standards, local standards, group standards and enterprise standards.

The rationale behind the formulation of China's Food Safety Standards was to provide a framework to protect consumers' interests, health and safety, promote scientific and technological achievements, protect the environment, and enhance the universal interchange of products and the coordination of standards.

These food safety standards cover eight key aspects:

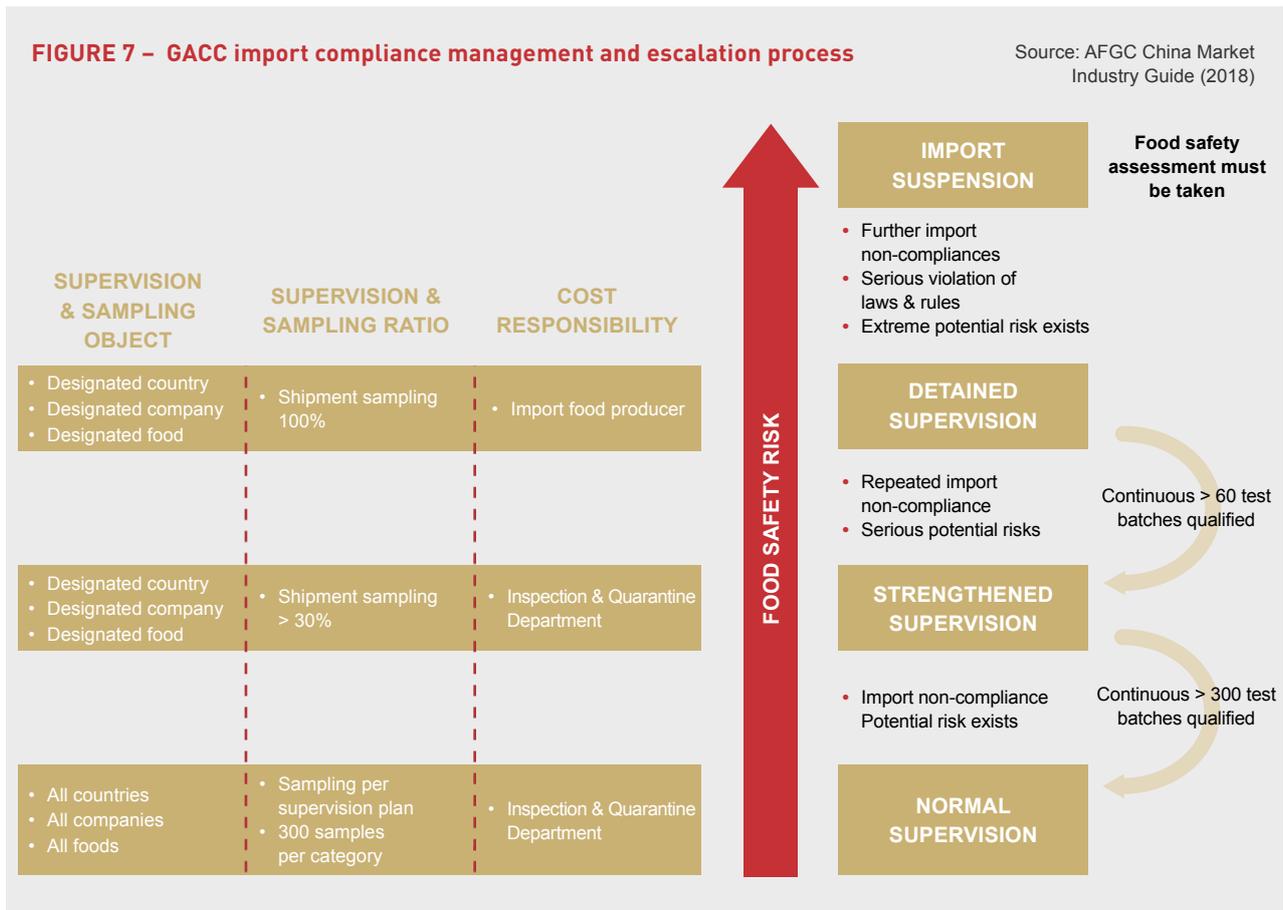
- pathogenic microorganisms
- pesticide residues
- veterinary drug residues
- biotoxins
- heavy metals
- additives (including provisions on the scope of use and dosage)
- nutritional requirements
- label requirements.

While this Guide focuses specifically on the food labelling requirements, exporters should familiarise themselves with all the food safety standards pertaining to their product, so as to ensure import compliance.

### 5.5 ENFORCEMENT OF PENALTIES FOR NON-COMPLIANCE

The GACC has provided clarity around non-compliance the escalation process and penalties. Exporters could face increased costs and border clearance delays as a consequence of breaches of import regulations, with the ultimate sanction being import license suspension.

Border clearance failures are recorded on the publicly available GACC [Blacklist](#) each month. Label non-compliances are one of the major reasons for import shipment rejections, so it is very important for exporters to work closely with their China partners to ensure label design, content and formatting is fully compliant prior to commencing exports, to minimise the risk of repeated breaches leading to punitive actions being taken by the GACC. Figure 7 illustrates the import compliance management and escalation process.





# 6. Product Label Requirements

- 6.1 Regulatory Compliance
- 6.2 Terms and Definitions
- 6.3 Label Information (General Rules)
- 6.4 Label Information (Nutritional Information Panel)
- 6.5 Label Information (Special Dietary Foods)
- 6.6 Cross-Border E-Commerce Label Information

## 6. PRODUCT LABEL REQUIREMENTS

### 6.1 REGULATORY COMPLIANCE

Article 94 of the China Food Safety Law (2015) states that '*overseas exporters and overseas production enterprises ... shall be responsible for the contents of labels and instructions. Therefore, labels must be ... in accordance with the requirements of laws and regulations and the related food safety standard(s)*' (see GB7718-2011, 3.1).

Since 1 October 2019, to simplify the customs clearance process, the label filing system for prepackaged imported food has been abolished. This does not mean that the supervision of food labels has also been abolished. If the imported prepackaged food is selected for inspection or testing, the importer must provide the GACC with all certification material, including the original English and Chinese label.

This has the potential to increase import compliance risk for exporters, because it is no longer possible to import a small quantity of product as a 'first-time import' to secure label registration before committing to larger ongoing shipment quantities.

There are many food safety standards covering all aspects of food health and safety. A list of the more prominent food safety standards is provided in Appendix 2 of this guide, and it is recommended that exporters familiarise themselves with those that may be applicable to their food products prior to exporting, even when relying on a third party to secure import compliance.

The three food safety standards listed below are specific to prepackaged food labelling requirements. Please note these do not apply to food imported in bulk or food that is further processed and on-sold after arrival.

#### 6.1.1 National Food Safety Standard GB7718-2011: General Rules for the Labelling of Prepackaged Foods

On 13 May 2011, China's Ministry of Health published a National Food Safety Standard on the General Rules for the Labelling of Prepackaged Foods, adopted on 20 April 2012. This standard stipulates the requirements for the content and format of the information displayed on the product label of all prepackaged foods sold, directly or indirectly, to consumers.

#### 6.1.2 National Food Safety Standard GB28050-2011: General Principles for Nutrition Label of Prepackaged Foods

Implemented on 1 January 2013, this standard should be read in conjunction with GB7718-2011. This standard stipulates the requirements for the content and format of the information to be displayed on the nutritional information panel (NIP) component of the product label. It applies to the labelling of all prepackaged foods sold, directly or indirectly, to consumers. Please note, it does not apply to the packaging used for the protection and transportation of prepackaged foods.

#### 6.1.3 National Food Safety Standard GB13432-2013: Prepackaged Special Dietary Food Labels

Implemented on 1 July 2015, this standard stipulates additional label requirements applicable to special dietary products.



## 6.2 TERMS AND DEFINITIONS

The following terms and definitions apply when interpreting these standards:

<b>Configuration</b> means the descriptions of the relationship between total net weight and the units when the prepackaged food contains more than one prepackaged food.	(See GB7718-2011, 2.6)
<b>Core Nutrient</b> refers to protein, fat, carbohydrate and sodium.	(See GB28050-2011, 2.4)
<b>Date of Manufacture</b> is the date on which the food becomes the final product and is packaged for sale.	(See GB7718-2011, 2.4)
<b>Date of Minimum Durability</b> is the 'best before' or 'expiry' date, meaning the date which signifies the end of the period under stated storage conditions during which the quality of the product will be maintained.	(See GB7718-2011, 2.5)
<b>Dietary Part</b> refers to the residue of prepackaged food after inedible components are deducted from the net content.	(See GB28050-2011, 2.10)
<b>Food Label</b> means any words, pictorial, mark or other descriptive matter on the package or the container of food.	(See GB7718-2011, 2.2)
<b>Functional Statement of Nutritional Component</b> relates to statements on growth, development and normal physiological functions of the human body.	(See GB28050-2011, 2.8)
<b>GACC</b> General Administration of Customs China	
<b>Ingredients</b> refers to any substance used in the manufacture or preparation of a food and present in the final product (including in a modified form), including any additive.	(See GB7718-2011, 2.3)
<b>Nutrients</b> are substances in food that have specific physiological functions and can maintain the growth, development, activity, reproduction and normal metabolism of the body, including proteins, fats, carbohydrates, minerals and vitamins.	(See GB28050-2011, 2.2)
<b>Nutritional Component</b> refers to the nutrients and other components in foods having nutritional and/or physiological functions. <i>Note: For definitions of various nutritional components, refer to GB/Z21922 Fundamental Terminology and Definition of Nutritional Components in Foods.</i>	(See GB28050-2011)
<b>Nutritional Statement</b> is the description and statement of nutritional characteristics of foods such as energy level and protein count. The nutritional statement includes content and comparison statements.	(See GB28050-2011, 2.7)
<b>Nutrition Component Table</b> is the normative table indicating the name and content of nutritional components and their percentage, expressed as a 'nutrient reference value' (NRV).	(See GB28050-2011, 2.5)
<b>Nutrition Label</b> refers to the description of the nutritional information and food characteristics, including the table of nutritional ingredients (nutritional information panel, or NIP) provided to consumers.	(See GB28050-2011, 2.1)
<b>Prepackaged Food</b> is defined as that which is made up in advance with a measured quantity in a container with a volume that is the final stock-keeping unit (SKU) for individual sale to the consumer.	(See GB28050-2011, 2.1)
<b>Principal Display Panel</b> refers to the panel most easily found on the product packaging or container.	(See GB7718-2011, 2.7)
<b>Rounding Interval</b> is the minimum unit of rounding value.	(See GB28050-2011, 2.9)
<b>Special Dietary Foods</b> refers to those foods specially processed or formulated to meet special physical or physiological conditions. The nutrients are typically significantly different from those in comparable common foods.	(See GB13432-2013, 2.1)

## 6.3 LABEL INFORMATION (GENERAL RULES)

The critical first step in securing label compliance is to ensure the product ingredients conform to food safety standards. If the product has been incorrectly categorised, or an ingredient is not compliant with the relevant GB food standard, then the label will also be non-compliant. While this appears self-evident, it is one of the leading reasons for China import shipment failures.

This is addressed further in this Guide and a case study has been provided to illustrate the complexities involved in determining food ingredient compliance.

The full list of requirements relating to the general rules for the labelling of prepackaged foods is addressed by GB7718-2011 and exporters should refer directly to this standard to ensure they are referencing the most up-to-date information.

Food labels are often carefully scrutinised by shoppers prior to making their purchase decision.

### 6.3.1 Fundamental Requirements

China's food labelling standards seek to inform and protect consumers by focusing on the following core principles:

#### *Legibility*

Labels must be 'clear, prominent, indelible and readily legible' by consumers (see GB7718-2011, 3.1).

The label information must be presented in normal Chinese characters and the characters and fonts must be written correctly and readily legible (see GB7718-2011, 3.8). The trademark registered in China can be presented 'as is' on the label. The Chinese pinyin or languages of minority ethnic groups may be added as well, but cannot be larger than the corresponding Chinese characters (see GB7718-2011, 3.8.1).

Foreign languages (e.g. English) may also be used if they correspond to the Chinese characters. Again, the foreign letters cannot exceed the size of the corresponding Chinese characters (except for registered trademarks). The exceptions to this are the name and address of the manufacturer and overseas distributor, and the website address (see GB7718-2011, 3.8.2).

The size of the characters presented on the label is relative to the overall label size. For example, 'where the largest surface area of the package or container is more than 35cm<sup>2</sup>, the minimum size of the words, symbols and numerals in the mandatory labelling information must be not less than 1.8mm in height' (see GB7718-2011, 3.9).

Similarly, where the package or container is less than a certain size, some mandatory information can be excluded from the label. Information on the calculation methods is provided in Appendix A of GB7718-2011.

#### *Understanding*

Labels must be 'easily understood ... precise and supported by scientific evidence' (see GB7718-2011, 3.1). References to superstitions, unproven claims or disparaging references to other products are not permitted (see GB7718-2011, 3.3). Depending on the claim made on the label, the exporter could be required to provide validation.

#### *Accuracy*

Labels must be 'true and accurate and shall not be described or presented in a manner that is false, misleading, or deceptive' (see GB7718-2011, 3.4). Similarly, the product label cannot include words or images which are 'suggestive ... of any other product with which such food ... might be confused' (see GB7718-2011, 3.5).

Similarly, any claims made on health product labels must be within the scope of what has been approved by China for the ingredients listed for the product. GB7718-2011, 3.6 states that the label must not 'declare or imply contents with the effect of prevention or curing of diseases'.

Likewise, for products not approved for import as health products, no health-related claims can be made on the label.

Note that any reference to the term 'organic' on the food label is not permissible, unless the production entity and processes have been independently certified as such by an authorised China accreditation entity.

**FIGURE 8 – Examples of product claims that would require validation**



### **Completeness**

The product label must not be separated from the food and its package or container (see GB7718-2011, 3.7). However, overlay labels declaring the relevant Chinese information can be applied to the product prior to import clearance. The information on the overlay label must match the corresponding information declared on the original product packaging or container.

### **6.3.2 Mandatory Label Declarations**

GB7718-2011, 4.1 stipulates the mandatory information that must be declared on labels for products that are packaged for distribution direct to consumers.

#### ***Food Name (see GB7718-2011, 4.1.2)***

The name must be presented in the most prominent place on the label and clearly indicate the true nature of the food.

#### ***List of Ingredients (see GB7718-2011, 4.1.3)***

It is important to use the correct terminology when listing ingredients. Some 'common usage', abbreviated or colloquial terms that might be acceptable for Australian domestic products may not be acceptable by the GACC.

Note that the names of any declared food additives must be in accordance with GB2760-2014 Standard for Uses of Food Additives.

**Net Weight and Configuration (see GB7718-2011, 4.1.5).**

The standard stipulates how the unit of measurements should be expressed, minimum font sizes and how the information must be displayed on the label.

**Name and Contact Information of Manufacturer, Importer and Distributor (see GB7718-2011, 4.1.6)**

Details of the entity bearing responsibility for the safety and quality of the product in accordance with China’s food safety laws must be displayed on the label. For domestically produced foods, this is the manufacturer. However, for imported foods responsibility lies with either the Chinese importer or distributor. Therefore, for imported foods, labels must include the relevant contact details of the importer and/or the distributor. Manufacturer details are optional (see GB7718-2011, 4.1.6.3).

**Date Marking (see GB7718-2011, 4.1.7)**

The key point to note here is that both the date of manufacture and the date of minimum durability must be clearly declared and there must be no amendment or stickered supplement to these declared dates (see GB7718-2011, 4.1.7.1). Note that the date coding must be in the sequence year, month and day, unless otherwise declared on the label (see GB7718-2011, 4.1.7.3).

**Conditions for Storage (see GB7718-2011, 4.1.8)**

In addition to declaring special conditions for storage, the food production licence number and any relevant product or quality standard must also be declared (see GB7718-2011, 4.1.10).

**Nutritional Information Panel (see GB28050-2011)**

The nutritional information panel (NIP) must be displayed on the label. The requirements for content and formatting are specifically addressed in GB28050-2011 which is outlined later in this Guide.

**FIGURE 9 – Example of China compliant overlay label**

**Generic name of any food additives used**

**Country of origin**

**Manufacturer registration number**

**Storage directions & condition of use**

**Date marking information**

**Distributor or importer name**

**Distributor or importer address**

**Distributor or importer contact details**

**Net content**

**Product name**

**Nutritional information**

营养成分表		
项目	每100克	NRV%
能量	544千焦	6%
蛋白质	3.8克	6%
脂肪	9.0克	15%
碳水化合物	8.6克	3%
钠	54毫克	3%
钙	85毫克	11%

Note that where the selling unit comprises a number of independent selling units or packages, the food label of each independent package must be declared and approved separately (see GB7718-2011, 3.10).

Where an outer wrapper is used through which the inner labelling information can be clearly distinguished (e.g. a clear plastic sleeve) the labelling does not need to be repeated on the outer wrapper (see GB7718-2011, 3.11).

FIGURE 10 – Example of China compliant product label

Source: Fonterra Australia



**6.3.3 Optional Label Declarations**

**Allergies (see GB7718-2011,4.4.3)**

Where a food category might trigger an allergic reaction, this can be declared either directly in the ingredients list or as a notation accompanying the ingredients list.

**6.3.4 Exemptions**

Exemptions for some mandatory labelling requirements have been listed in GB7718-2011, 4.3. Examples include some alcoholic beverages, vinegar and salt and in other products where the determination of the product’s minimum use-by date is not possible or relevant.

For products where the label surface area is less than 10cm<sup>2</sup>, just the name of the product, net weight and importer or distributor details need be declared, in the interests of legibility (see GB7718-2011, 4.3.2)

## KEY 'WATCH OUTS'

1

In addition to the food labelling GB standards highlighted in this Guide, it is possible that food category specific GB standards may also prescribe additional label requirements. There are several thousand GB food standards, so it is not possible to capture these exceptions in this Guide, but exporters should carefully review the GB food standards applicable to their food category for any references to label declarations.

One example of this is GB19645-2010 – Pasteurised Milk, which, while primarily focusing on product testing, also details product-specific label declaration: *“Fresh cow (goat) milk” or “Fresh cow (goat) dairy” in Chinese characters in the main display panel of packaging ... close to the position of product name. The font in Chinese shall not be smaller than the product name ... the font height shall not be less than **one-fifth** of main display panel* (GB19645-2010, 5).

2

The accuracy and completeness of information declared on the product packaging or container is extremely important in securing compliance. The GACC will usually request evidence to support any claim made. For statements such as '100% Pure', providing empirical data to support this can be problematic.

3

From time to time Chinese regulatory authorities will draft and circulate proposed amendments and announcements. There is generally a grace period provided for any regulatory changes adopted. However, exporters should ensure they stay up to date with any proposed changes to ensure enough time to transition to revised labelling if required.

4

Recently, proposed changes to China food labelling regulations were reviewed, including an amendment that could see the application of China-compliant overlay labels upon shipment arrival being abolished. This change would have significant repercussions for exporters looking to 'test' the market without incurring the cost of redesigning and applying a China-compliant label during production.

5

If a prepackaged food label is deemed non-compliant when inspected by the GACC during customs clearance, the product may be rejected, meaning it will either have to be shipped back to Australia or disposed of under GACC supervision.

Rejected shipments are published on the GACC [Blacklist](#) and repeated failures may result in escalation and penalties (see [Section 5.5 Enforcement of Penalties for Non Compliance](#)).

## 6.4 LABEL INFORMATION (NUTRITIONAL INFORMATION PANEL)

The full list of requirements relating to the nutritional information declared on the label is addressed by GB28050-2011 and exporters should refer directly to this standard to ensure they are referencing the most up-to-date information.

### 6.4.1 Fundamental Requirements

In addition to the fundamental requirements outlined in the general rules above, several additional general principles stipulated in GB28050-2011 apply specifically to the information declared in the label's nutritional information panel (NIP).

#### Format

The nutrition table must be expressed in a square frame which may be of any size and which must be vertical to the package baseline under the title of 'Nutrition Table' (see GB28050-2011, 3.3).

The required layout of the nutrition label itself is outlined in GB20850-2011, Annex B. Several templates are provided, and the exporter should select the option most suited to the nutritional characteristics of the food, package area and packaging shape (see GB28050-2011, 3.5).

#### Content

The nutritional components in the food must be expressed in absolute values which can be obtained through the analysis of the raw material or visual inspection. Importantly, the nutritional reference value (NRV) of the various components must be calculated and included.

FIGURE 11 – Example of China compliant nutrition table

Nutritional information ———— 营养成分表

项目	每100克	NRV%
能量	544千焦	6%
蛋白质	3.8克	6%
脂肪	9.0克	15%
碳水化合物	8.6克	3%
钠	54毫克	3%
钙	85毫克	11%

Square frame ———— Nutritional reference value (NRV)

————— Absolute value

### 6.4.2 Mandatory NIP Declarations

In addition to the fundamental requirements outlined above, GB28050-2011, 4 stipulates that the NIP must contain the following mandatory labelling declarations:

#### ***Nutritional Reference Value (NRV) (see GB28050-2011, 4.1 and 4.2)***

This is the contents of energy and core nutrients expressed as a percentage value. GB28050-2011, Annex A specifies reference values of energy and 32 nutritional components. Where other components are indicated, the energy and core nutrients must be included in the NRV.

If there is a nutritional or functional statement displaying nutritional components other than energy and core nutrients, then these nutritional components must be included in the NRV calculation displayed in the nutrition table.

#### ***Nutritional Enhancer (see GB28050-2011, 4.3)***

If the food contains a nutritional enhancer, the NRV must be recalculated to reflect this.

#### ***Trans Fat (Acid) Content (see GB28050-2011, 4.4)***

When hydrogenated and/or partially hydrogenated oil and fat are present as food ingredients, or used during food production, the trans fat content must be included in the nutrition table.

### 6.4.3 Optional NIP Declarations

In addition to the mandatory NIP declarations stipulated in GB28050-2011, 4, other components outlined in GB28050-2011, Table 1 can be included in the nutrition table.

#### ***Content Statement (see GB28050-2011, 5.2)***

A content statement may be included for a component that satisfies the criteria detailed in Annex B of GB28050-2011.

#### ***Comparison Statement (see GB28050-2011, 5.2)***

Provided the nutritional component satisfies the requirements and conditions outlined in Table C.3 of GB28050-2011, a comparison statement can be made for this component.



### 6.4.4 Expression Mode

GB28050-2011, Table 1 lists the information types (compulsory and optional), along with the correct expression type (e.g., kJ, g, mg), rounding interval and threshold values.

**TABLE 1 – Example**

NUTRITIONAL COMPONENT	EXPRESSION UNIT	ROUNDING INTERVAL	THRESHOLD VALUE (PER 100G OR 100ML)	ALLOWABLE ERROR RANGE
<b>Protein</b>	Gram (g)	0.1	≤ 0.5g	≥ 80% of indicated value
<b>Sodium</b>	Milligram (mg)	1	≤ 5mg	≥ 120% of indicated value

### 6.4.5 Exemptions

Some prepackaged foods may be exempt from compulsory nutritional labelling (see GB28050-2011, 7). These include raw and fresh foods such as packaged raw meat, raw fish, raw vegetables, fruit, eggs, certain beverages, drinking water, and foods in which the total package surface area is less than a prescribed size.

*Note: The information listed in the GB28050-2011 Tables and Annexes may be updated periodically and exporters should always refer to the most current version of the standard to ensure they have the most up-to-date nutritional information requirements.*



## 6.5 LABEL INFORMATION (SPECIAL DIETARY FOODS)

The general rules, principles and nutritional information requirements listed in GB7718-2011 and GB28050-2011 are also applicable to special dietary prepackaged foods. However, there are additional requirements listed in GB13432-2013. Exporters should refer directly to this GB standard to ensure they are referencing the most up-to-date information.

### 6.5.1 Fundamental Requirements

In addition to conforming to the fundamental requirements stipulated in GB7718-2011, information on the label must match the corresponding product standards for special dietary foods and no reference can be made to disease prevention or health treatment. Functional claims cannot be made for any essential ingredients included in foods that are produced for infants aged 0 to 6 months of age.

### 6.5.2 Mandatory Label Declarations

In addition to the requirements outlined in GB7718-2011, the following declarations are mandatory for special dietary food:

#### *Food Name (see GB13432-2013, 4.2)*

In addition to conforming to the fundamental requirements stipulated in (see GB7718-2011, 2), only food that meets the definition of 'special dietary food' can reference this terminology in the food name itself. Appendix A of GB13432-2013 also lists various categories of special dietary foods.

#### *Labelling of Energy and Nutrients (see GB13432-2013, 4.3)*

The relevant energy and nutrient information must be declared in the form of a box table entitled 'Nutrition Composition Table'. Clause 4.3 also stipulates how the information and values should be formatted.

#### *Consumption Methods and Portions (see GB13432-2013, 4.4)*

If applicable, information on recommended consumption methods and portions (e.g. frequency and amount) must be clearly indicated on the label and instructions on blending or rehydration included.

#### *Storage Conditions (see GB13432-2013, 4.5)*

Storage conditions must be displayed on the label, where applicable. If storage conditions vary after the product has been opened, this must also be indicated.

### 6.5.3 Optional Label Declarations

GB13432-2013, 5 lists the additional content that can be included on the label, if desired. This includes energy and nutritional content and functional claims. Please note the requirement to validate label claims (see GB7718-2011, 3.3).

### 6.5.4 Exemptions

Where the maximum surface area of the food packaging or container is less than 10cm<sup>2</sup>, only the product name, net content, name and address of the producer (or distributor), production date and shelf life need be included on the label.

## 6.6 CROSS-BORDER E-COMMERCE LABEL INFORMATION

### 6.6.1 Background

Different from general trade, China's Cross-Border E-Commerce (CBEC) retail importation pathway is designed to make it easier to import certain foreign goods for Chinese consumers' personal use to satisfy the growing domestic demand. Besides facilitating customs clearance procedures, the government has also rolled out favourable tax policies for e-commerce export enterprises.

As at May 2020, over 90 cities have joined the CBEC retail importation program. This program facilitates a more convenient import pathway, whereby imported retail goods can be temporarily stored at a bonded warehouse before being delivered to customers. These cities operate free trade zones (FTZs) and comprehensive bonded zones (zones), and act as logistics hubs with trading partner countries.

### 6.6.2 CBEC Import Modes of Operation

The CBEC retail imports can be divided into two modes of operation:

#### ***Bonded Warehouse Import (Customs Supervision Code 1210 and 1239)***

Goods are purchased in advance and temporarily stored in a bonded warehouse in China. After a consumer places an order, customs clearance and delivery is carried out immediately from the bonded warehouse and the products are delivered to consumers via logistic companies.

Currently, the bonded warehouse mode involves two customs supervision codes – 1210 and 1239. 1210 refers to 'online shopping bonded import mode' and is only applicable in CBEC retail importation pilot cities; 1239 refers to 'online shopping bonded import A mode' and is applicable in other cities not in the CBEC retail importation program.

#### ***Direct Shipping Mode (Customs Supervision Code 9610)***

In this scenario, consumers place an order through CBEC websites, following which overseas suppliers or sellers directly deliver the products to China by post or express, mainly by air. The product will need to go through the customs clearance process before being released to the consumer.

### 6.6.3 Label Requirements

There are no specific label requirements for goods imported via the CBEC pathway.

CBEC retail imports are regulated as items imported for personal use and not for resale. There are no requirements for license approval, registration or record filing for first-time importation, as long as the goods are on the 'List of Goods under Cross-border E-commerce Retail Importation' (commonly referred to as the 'CBEC [Positive List](#)'). The commercial transaction must be between the consumer and the overseas entity. Business to business (B2B) transactions are not permitted.



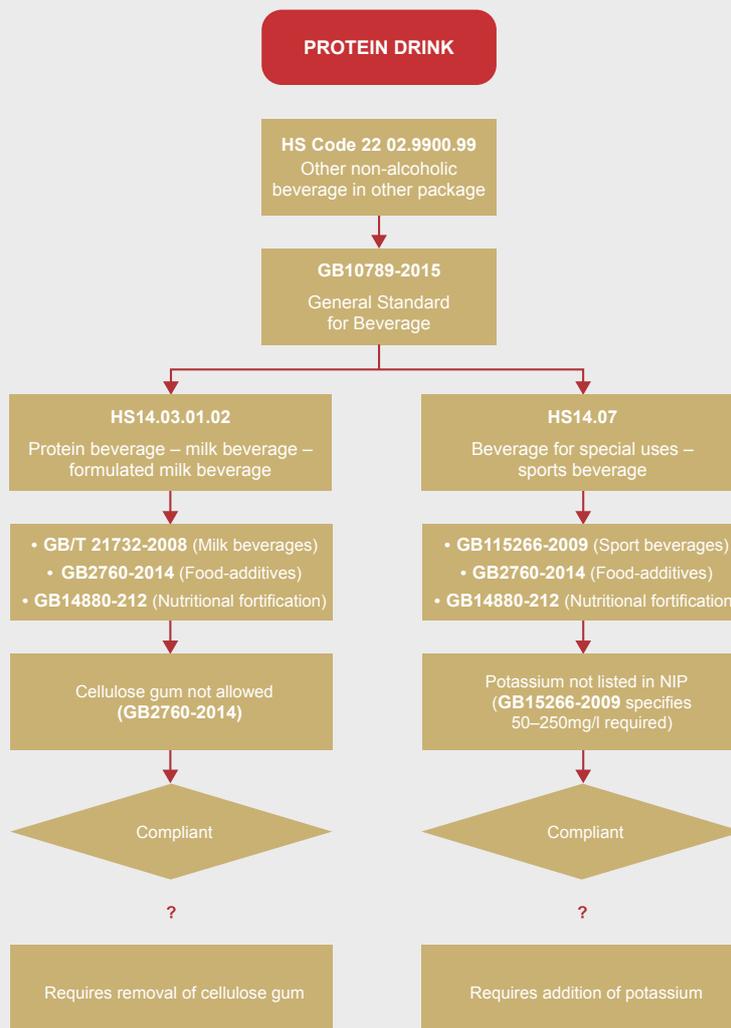
# 7. Label Compliance Steps

# 7. LABEL COMPLIANCE STEPS

Exporters must ensure food classification, ingredients and formulation are all fully compliant before developing the food label.

Situations may also arise whereby the food can be classified under different food safety standards, depending on the food's attributes. This raises the dilemma of varying ingredients or formulations being applicable for different classifications. The product classification selected will impact permitted ingredients and therefore label compliance. An example of the importance of product classification is provided below.

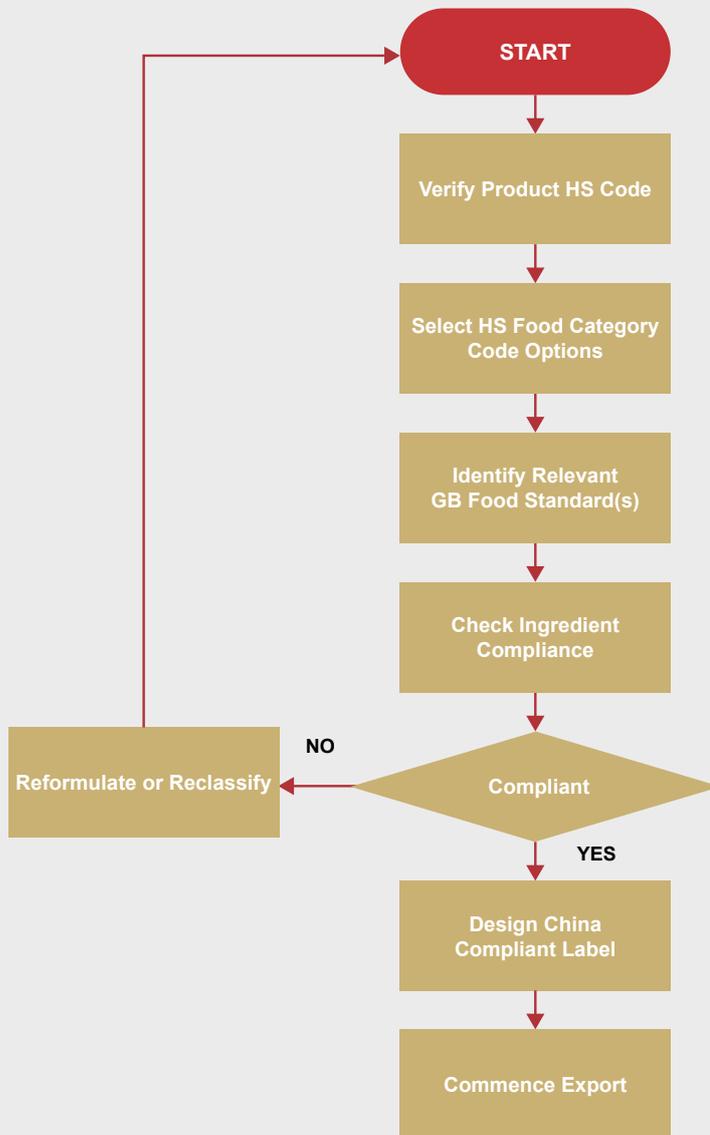
**FIGURE 12 – Example of the product classification implications**



Label compliance is the final step of the food import compliance process following product classification.

The process of label development is relatively straightforward. The criteria are listed in the relevant GB food labelling standards and there are several third-party service providers who can provide expert assistance to exporters, should this be required.

**FIGURE 13 – China food import compliance process**





## 8. Frequently Asked Questions

## 8. FREQUENTLY ASKED QUESTIONS

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This Guide tries to assist exporters in understanding and meeting the challenges involved in securing China compliance for their prepackaged food labels in accordance with existing China regulatory requirements. Regulations will be added, amended or deleted from time to time. Therefore, the onus is on exporters to ensure they take into account any changes and adjust their labels accordingly to ensure ongoing compliance.

In addition to the risk posed by future regulatory changes, exporters also need to be cognisant of changing conditions, commercial considerations and consumer perceptions. Below is a list of questions exporters may have in relation to broader China label compliance concerns.

### **Q. What regulatory changes are likely to impact China food labelling laws in the next 12 months?**

In September 2020 China notified the World Trade Organization of revised draft measures on the supervision and management of food labelling. The measures are intended to apply to both imported and domestically produced products. China has not announced a proposed date of entry into force for the measures.

Exporters should review these proposed measures to understand what impact they may have on their existing labels. Some proposed changes are listed below.

#### ***Revised Draft Measures on Supervision and Management of Food Labelling (23 September 2020)***

The majority of the proposed measures focus on label design and formatting. These may require exporters to make minor changes to pre-existing China compliant labels.

Article 11 is very significant as it proposes that imported food shall have Chinese labelling; the Chinese labelling shall be directly affixed to, printed on or marked on the smallest sized package. It is not allowable for the Chinese labelling to cover the original information on the foreign language labelling.

If this measure is adopted, then product overlay labels can no longer be applied to prepackaged foods upon shipment arrival in China and prior to Customs clearance. This will have a major impact on exporters seeking to 'test' the China market by utilising their domestically labelled product prior to investing in the design of a China-compliant label to be applied during production.



### **National Food Safety Standard – General Rules for Nutritional Labelling of Prepackaged Foods (14 September 2020) Draft**

This standard would replace GB28050-2011, National Food Safety Standard – General Rules for Nutritional Labelling of Prepackaged Foods.

Compared with GB28050-2011, the main changes proposed in this standard are as follows:

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• Added: nutrients that require mandatory labelling.</li> <li>• Supplemented: terms and definitions of energy and some nutritional components.</li> <li>• Modified: the optional labelling contents and added other supplementary information.</li> <li>• Modified: the permissible margin of error of some nutritional components.</li> </ul> | <ul style="list-style-type: none"> <li>• Modified: the prepackaged foods that are exempted from mandatory nutritional labelling.</li> <li>• Modified: some nutrients reference value (NRV).</li> <li>• Modified: the format of nutritional labelling.</li> <li>• Modified: the standard terms for the nutritional claims and the nutrient function claims.</li> <li>• Added: the serving size reference of prepackaged foods.</li> </ul> |
|---|--|

Exporters will need to check if these additions and modifications will impact on their existing label nutritional information panels.

#### **Q. Why is food traceability so important?**

Food traceability is closely linked to trust. Food safety, product provenance and quality are the leading factors influencing Chinese consumer purchasing decisions. The more the level of assurance exporters can provide consumers, the greater the level of trust generated. This trust can translate into brand loyalty and product sales.

Trust is also an important consideration for both the GACC and the State Administration for Market Regulation (SAMR). These authorities are responsible for safeguarding Chinese consumers from potentially harmful or counterfeit food imports. Being able to demonstrate a comprehensive product traceability system will assist in streamlining border clearance and market access.

Finally, both online and offline retailers are now actively seeking to provide their customers with digital traceability systems as a point of difference. This is rapidly becoming a minimum entry requirement for food brands to access platforms and retail networks.

There are many product authentication and traceability systems in the market now, ranging from QR codes printed on the label through to specially designed electronic chips embedded in the product packaging. A note of caution: some of the solutions available in the market are not effective in preventing product counterfeiting. Exporters should research the solution that best satisfies their requirements.

### Q. How can I ensure label compliance prior to commencing shipments?

Following the abolition of the first-time import label filing system on 1 October 2019, the mandatory GACC inspection of food label compliance during the first-time import is no longer carried out. Labels can now be selected for inspection at any time as part of the GACC randomized import selection and testing process.

The frequency of import shipment inspection and testing is based on the food category and the importer's record of compliance. Shipments are selected at random by the GACC import management system. Consequently, it is likely a new product label may not be selected for inspection until after multiple imports. This can increase the risk for exporters who may have erroneously assumed that their label was compliant given prior successful import shipments.

In addition to exporters ensuring they have a comprehensive understanding of China label compliance regulations, they should also seek independent validation of label compliance from third-party service providers.

### Q. What is the GACC Blacklist?

The GACC [Blacklist](#) is a register of all import shipments that fail customs import inspection and testing. It is an Excel report that is updated and published monthly. The information listed is comprehensive and includes brand name, exporter, importer, port of arrival, quantity and reason for rejection.

### Q. What happens if my food is involved in a food safety incident?

The GACC monitors food safety incidents abroad and the SAMR monitors domestic food safety incidents. The importer may be required to activate its product recall procedure for a food safety incident that poses a safety hazard. It is important that exporters have liaised with their China partners to ensure an acceptable product recall system is in place. Many exporters utilise the product label to facilitate this, whether in the form of a QR code, bar code data matrix or some other form of product identification.





# 9. Conclusion

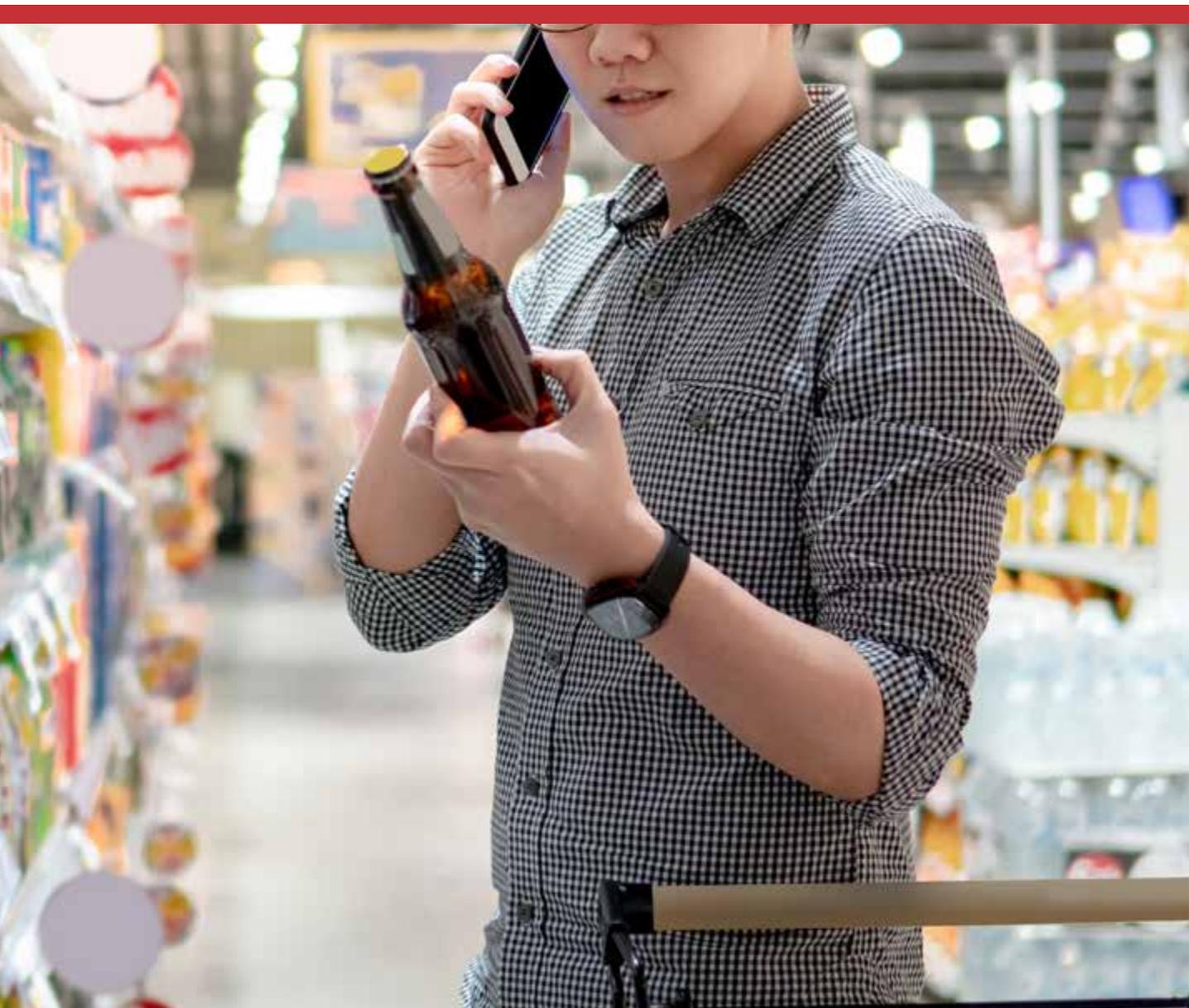
## 9. CONCLUSION

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China remains an attractive market for exporters despite some uncertainty which may persist in the short to medium term. Positive macroeconomic conditions and growth in middle income population will continue to increase demand for food and beverage products and consumer preferences towards premium, safe, and healthy products will present opportunities for Australian exporters.

The Chinese government has increased emphasis on food safety and has set up a regulatory system with comprehensive requirements to protect consumers. It is important exporters understand the various laws and design products and their labelling complying with those laws before shipping products to China.

It is hoped that this Guide can provide Australian exporters with a greater awareness and understanding of both the technical criteria and the rationale behind China's imported food labelling laws.





# Appendixes

**Appendix 1. Extract of China Food Safety Laws and Regulations**

**Appendix 2. Extract of China Food Safety Standards**

## APPENDIX 1. EXTRACT OF CHINA FOOD SAFETY LAWS AND REGULATIONS

REF	NAME OF THE LAWS AND REGULATIONS	CURRENT VERSION/NO.
1	Presidential Order No.21 Food Safety Law of the People's Republic of China	Amended on December 29, 2018
2	State Council Order No.721 Regulations on the Implementation of Food Safety Law of the People's Republic of China	Revised on October 31, 2019
3	Presidential Order No.71 Production Quality Law of the People's Republic of China	The third revision on December 29, 2018
4	Presidential Order No.78 Standard Law of the People's Republic of China	The 30th revision on November 4, 2017
5	State Council Order No.53 Regulations on the Implementation of Standard Law of the People's Republic of China	Issued on April 6, 1990
6	Presidential Order No.28 Metrology Law of the People's Republic of China	Amended on October 26, 2018
7	Presidential Order No.22 Advertising Law of the People's Republic of China	Amended in 2018
8	Presidential Order No.83 Frontier Health and Quarantine Law of the People's Republic of China	Amended on April 27, 2018
9	Presidential Order No.67 Law of the People's Republic of China on Import and Export Commodity Inspection	The 5th revision on December 29, 2018
10	Presidential Order No.7 Law of the People's Republic of China on the Protection of Consumers' Rights and Interests	The 2nd revision on October 25, 2013
11	State Council Order No.503 Special Provisions of the State Council on Strengthening the Supervision and Management of the Safety of Food and Other Products	Issued on 26 July 2007

REF	REGULATIONS OF THE STATE COUNCIL	CURRENT VERSION/NO.
1	Order No.144 of the General Administration of Quality Supervision, Inspection and Quarantine, Measures for the Administration of Import and Export Food Safety	Revised in 2018
2	Order No.192 of the General Administration of Quality Supervision, Inspection and Quarantine, Provisions on the Administration of Filing of Export Food Production Enterprises	2018
3	Order No.145 of the General Administration of Quality Supervision, Inspection and Quarantine, Provisions on the Administration of Registration of Overseas Production Enterprises of Imported Food	Amended on November 27, 2018. In 2019, the General Administration of Customs issued a draft for comment
4	Order No.24 of the State Administration for Market Regulation, Measures for the Administration of Food Production License	Implemented on March 1, 2020
5	Order No.24 of the State Food and Drug Administration, Measures for the Registration Administration of Formulated Foods for Special Medical Uses	2016
6	Order No.22 of the State Food and Drug Administration, Administrative Measures on Registration and Filing of Health Foods	2016
7	Order No.17 of the State Food and Drug Administration, Measures for the Administration of Food Business Licenses	Revision on November 7, 2017
8	Order No.23 of the State Food and Drug Administration, Measures for the Administration of Daily Supervision and Inspection of Food Production and Operation	2016
9	Order No.102 of the General Administration of Quality Supervision, Inspection and Quarantine, Measures for the Administration of Food Labelling	2009
10	Order No.73 of the Ministry of Health, Measures for the Administration of New Varieties of Food Additives	Amended on December 26, 2017
11	Order No.12 of the State Food and Drug Administration, Measures for the Administration of Food Recall	2015 Version (September 1, 2015)
12	Order No.77 of the Ministry of Health, Measures for the Administration of National Standards for Food Safety	2010 Version (October 20, 2010)
13	The State Administration for Market Regulation issued a draft for comment of the Measures for the Supervision and Administration of Food Labelling	July 27, 2020
14	Order No.24 of the State Administration for Market Regulation, Measures for the Administration of Food Safety Sampling Inspection	Implemented on October 1, 2019

Source: Concise Handbook of Chinese Laws and Regulations on the Admittance of Imported Foods (2020)

## APPENDIX 2. EXTRACT OF CHINA FOOD SAFETY STANDARDS

REF	GENERAL STANDARDS	CURRENT VERSION/NO.
1	National Standards for Food Safety – Standards for the Use of Food Additives	GB2760-2014
2	National Standards for Food Safety – Maximum Residue Limits of Pesticides in Food	GB2763-2019
3	National Standards for Food Safety – Maximum Residue Limits of Veterinary Drugs in Food	GB31650-2019
4	National Standards for Food Safety – Limit of Pollutants in Food	GB2762-2017
5	National Standards for Food Safety – Limit of Mycotoxins in Food	GB2761-2017
6	National Standards for Food Safety – Limit of Pathogenic Bacteria in Food	GB29921-2013
7	National Standards for Food Safety – General Rules for the Labelling of Prepackaged Foods	GB7718-2011
8	National Standards for Food Safety – General Principles for the Nutrition Label of Prepackaged Foods	GB28050-2011

REF	PRODUCT STANDARD CATEGORY (DAIRY PRODUCTS)	STANDARD NUMBER
1	National Food Safety Standard – Raw Milk	GB19301-2010
2	National Food Safety Standard – Cheese	GB5420-2010
3	National Food Safety Standard – Fermented Milk	GB19302-2010
4	National Food Safety Standard – Milk Powder	GB19644-2010
5	National Food Safety Standard – Pasteurised Milk	GB19645-2010
6	National Food Safety Standard – Cream, Butter and Anhydrous Milkfat	GB19646-2010
7	National Food Safety Standard – Modified Milk	GB25191-2010
8	National Food Safety Standard – Processed Cheese	GB25192-2010
9	National Food Safety Standard – Whey Powder and Whey Protein Powder	GB11674-2010
10	National Food Safety Standard – Condensed Milk	GB13102-2010
11	National Food Safety Standard – Sterilised Milk	GB25190-2010
12	National Food Safety Standard – Lactose	GB25595-2018

China's product standards cover a range of categories including milk and dairy products, fats and oils, frozen drinks, fruits and vegetables, cocoa and cocoa products, candy, baked products, meat and meat products, aquatic products, foods for special dietary uses, beverages including wine, food additives and food packaging.

Source: Concise Handbook of Chinese Laws and Regulations on the Admittance of Imported Foods (2020)



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