

**Voluntary Report** – Voluntary - Public Distribution

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**Report Name:** Decree 280 - GACC Update to Overseas Food Facility  
Registration

**Country:** China - People's Republic of

**Post:** Beijing

**Report Category:** FAIRS Subject Report, Trade Policy Monitoring

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**Report Highlights:**

The GACC announced the Regulations on the Registration and Administration of Overseas Producers of Imported Food as GACC Decree 280. The regulation will enter into force on June 1, 2026, and will replace the current Regulations on the Registration and Administration of Overseas Producers of Imported Food (Decree 248). This report provides an unofficial translation of Decree 280 and a summary of the major changes between Decree 248 and the new Decree 280.

FAS China provides this reporting and analysis as a service to U.S. farmers, ranchers, rural communities, and agribusinesses in support of a worldwide agricultural information system and a level playing field for U.S. agriculture.

## **Report Summary:**

On October 14, 2025, the General Administration of Customs of China (GACC) announced the *Regulations on the Registration and Administration of Overseas Producers of Imported Food* as GACC Decree 280. The regulation will enter into force on June 1, 2026, and will replace the current *Regulations on the Registration and Administration of Overseas Producers of Imported Food* (Decree 248). The following is a summary of the major changes between Decree 248 and the new Decree 280.

- Catalog of Foods Requiring Official Recommendation (Article 6): GACC is replacing the fixed list of 18 categories (e.g., meat, dairy, aquatic products, bee products, specialty foods) that require host country official recommendation with a dynamic catalog of foods requiring official recommendation, which GACC determines and publishes based on risk analysis. Decree 280 states that GACC will publish the catalog at a later date.
- Audit and Inspection Report (Article 8): Decree 280 stipulates that overseas producers of food listed in the Catalog must obtain an audit and inspection report and a letter of recommendation from their competent authorities.
- New Registration Mechanisms (Article 9; 17-18): GACC introduced a new “list registration method” for countries whose food safety systems GACC recognizes and with whom GACC has signed cooperation agreements. GACC will continue to register facilities on an individual basis as well. The individual process will, however, change from the two registrations methods of self-registered and competent authority recommended to a single registration process where the enterprise submits all documentation to GACC directly. Only those companies whose products are listed in the Catalog will need to also submit inspection reports and recommendation letters from competent authorities.
- Requiring New Registrations (Article 20): Decree 280 requires re-application only if specific changes (relocation, legal representative, etc.) cause a major impact on the enterprise's food safety and hygiene management. The exact parameters that GACC will use to determine the food safety impact, however, are not yet known.
- Renewal Process (Article 21-22): Decree 280 sets the validity of each registration to 5 years and establishes an automatic renewal for 5 years for certain products. In addition, the application window for products that are excluded from the automatic renewal process is extended from 3 to 12 months before expiration. Decree 248 only allowed registrations to apply for renewal 3 to 6 months before expiration. GACC will release the List of Non-Automatically Renewable Imported Foods at a later date.
- Revocation (Article 27): Decree 280 expanded the list of revocation grounds from seven to nine.
- Storage Facilities (Article 30): While Decree 280 still applies to overseas producers, processing, and storage facilities that export food to China, GACC will issue a separate scope for overseas storage facilities at a later date.

- Cross-border e-commerce (CBEC) and Primary Edible Agricultural Products (Article 30): Decree 280 states that CBEC retail imported products are governed under separate regulations and are generally exempt from this regulation, while the registration and management of overseas producers of primary edible agricultural products shall be separately formulated.

This report provides an unofficial translation of Decree 280. In addition, an unofficial translation of GACC's interpretation of Decree 280 is also attached.

## **BEGIN UNOFFICIAL TRANSLATION**

### **Regulations on the Registration and Administration of Overseas Producers of Imported Food by the Customs of the People's Republic of China (General Administration of Customs Decree No. 280)**

(Announced by General Administration of Customs Decree No. 280 on October 14, 2025, effective June 1, 2026)

#### **Chapter I General Provisions**

**Article 1:** These Provisions are formulated in accordance with the “provisions of the Food Safety Law of the People's Republic of China” and its implementing regulations, “the Import and Export Commodity Inspection Law of the People's Republic of China” and its implementing regulations, the “Entry and Exit Animal and Plant Quarantine Law of the People's Republic of China” and its implementing regulations, and the “Special Provisions of the State Council on Strengthening the Supervision and Administration of Food and Other Product Safety”, and other laws and administrative regulations, to strengthen the registration administration of overseas producers of imported food.

**Article 2:** These Provisions shall apply to the registration administration of overseas producers, processing, and storage facilities that export food to China (hereinafter collectively referred to as overseas producers of imported food).

The overseas producers of imported food referred to in the preceding paragraph do not include producers, processing, and storage facilities of food additives or food-related products.

**Article 3:** The General Administration of Customs shall be responsible for the unified registration administration of overseas producers of imported food.

**Article 4:** Overseas producers of imported food shall be registered with the General Administration of Customs.

**Article 5:** The General Administration of Customs, in accordance with risk management principles and based on the assessment and review of the food safety management systems and food safety status of the countries (regions) where the overseas imported food producers are located, and taking into account the risk levels of the relevant foods, implements categorized

management of overseas imported food producers and determines the corresponding registration methods, application materials, review procedures, and other registration management requirements.

The General Administration of Customs may adjust the relevant registration management requirements based on risk assessments or evidence indicating changes in the safety risks of imported food.

## **Chapter II Conditions and Procedures for Registration**

**Article 6:** The General Administration of Customs shall, based on an analysis of factors such as the source of raw materials, production and processing techniques, historical food safety data, consumer demographics, and consumption patterns, and in accordance with international practices, determine and publish a catalog of imported foods requiring official recommendation for registration (hereinafter referred to as the Catalog).

**Article 7:** Registration Conditions for Overseas Producers of Imported Foods:

- (1) Approved and effectively supervised by the competent authorities of their country (region);
- (2) Establish an effective food safety and hygiene management and protection system, legally produce and export in their country (region), and ensure that food exported to China complies with relevant Chinese laws, regulations and national food safety standards;
- (3) Meet the relevant inspection and quarantine requirements agreed upon between the General Administration of Customs and the competent authorities of their country (region).

Overseas producers of foods listed in the Catalog shall also obtain recommendation from the competent authorities of their country (region).

**Article 8:** For overseas producers of foods listed in the Catalog, the competent authorities of their country (region) shall conduct an audit and inspection of the facilities and issue an audit and inspection report and a letter of recommendation to those that meet the registration requirements.

**Article 9:** Overseas producers of imported food shall submit the following application materials to the General Administration of Customs either on their own or through an agent:

- (1) Facility registration application information;
- (2) Facility identification documents, such as a business license or certificate issued by the competent authorities of the country (region) where they are located;
- (3) A statement by the facility committing to comply with the requirements of these Regulations.

Overseas producers of foods listed in the Catalog shall also submit an audit and inspection report and a letter of recommendation issued by the competent authorities of the country (region) where they are located.

If necessary, the General Administration of Customs may require the facility to provide information on its food safety, hygiene and protection system, production type, and production capacity.

**Article 10:** The information in a facility registration application shall include the facility name, country (region) where it is located, address of the production site, legal representative, contact person, contact information, registration number approved by the competent authorities of the country (region) where it is located, and the type of food to be registered.

**Article 11:** Registration application materials must be in Chinese or English.

The competent authorities of the country (region) where the importer is located and the overseas producers of imported food shall be responsible for the authenticity, completeness, and legality of the relevant materials.

**Article 12:** The General Administration of Customs will conduct assessment and review of overseas imported food production facilities applying for registration through written inspections, video inspections, on-site inspections and their combination, either on its own or by entrusting relevant agencies, based on the safety risk level of imported food.

Overseas producers of imported food and the competent authorities of the countries (regions) where they are located shall assist in carrying out the above-mentioned assessment and review work.

**Article 13:** Based on the assessment and review, the General Administration of Customs shall register and assign a registration number in China to the overseas producers of imported food that meet the requirements and notify the overseas producers of imported food in writing. It shall deny registration to the overseas producers of imported food that do not meet the requirements and notify the overseas producers of imported food in writing.

**Article 14:** When a registered producer exports food to China, it shall mark the food packaging with its registration number in China or a registration number approved by the competent authorities of the country (region) where the producer is located.

**Article 15:** The registration period for overseas producers of imported food is 5 years.

When registering the overseas producers of imported food, the General Administration of Customs shall determine the registration validity period.

**Article 16:** The General Administration of Customs shall publish a list of registered Overseas producers of imported food.

**Article 17:** If the food safety management system of the country (region) where Overseas producers of imported food is located is recognized by the General Administration of Customs and meets any of the following circumstances, the General Administration of Customs may agree

in writing with the competent authorities of the country (region) to adopt a list registration method for the producer:

- (1) It has signed an import and export food safety cooperation agreement with the General Administration of Customs;
- (2) It has signed a cooperation document such as an agreement, memorandum, joint statement, etc. with China that includes food safety cooperation content;
- (3) Other circumstances that the General Administration of Customs deems appropriate through risk assessment.

**Article 18:** Where the list registration method is adopted, the competent authorities of the country (region) shall submit the following materials to the General Administration of Customs:

- (1) Recommended list of food production facilities registered in China;
- (2) The application information listed in Article 10 of these Regulations;
- (3) A declaration that the recommended facility complies with the first paragraph of Article 7 of these Regulations;
- (4) A declaration of commitment to continuously fulfill the obligations agreed upon in the bilateral cooperation documents.

After review, the General Administration of Customs will register facilities on the list that meet the requirements and assign them registration numbers in China. Facilities on the list that do not meet the requirements will be denied and the competent authorities of the country (region) of residence will be notified in writing.

### **Chapter III Supervision and Management**

**Article 19:** The General Administration of Customs shall, on its own or by entrusting relevant agencies, conduct reviews of overseas producers of imported food to determine whether they continue to comply with registration requirements, based on the level of safety risk for imported food.

Overseas producers of imported food and the competent authorities of their respective countries (regions) shall assist in conducting such reviews.

**Article 20:** If the registration information of an overseas producers of imported food changes during the registration validity period, the producer shall submit a change application to the General Administration of Customs through the registration application process, along with the following materials:

- (1) A comparison table of registration item changes;
- (2) Supporting materials related to the changed information.

If the General Administration of Customs considers that the change is possible after evaluation, it will be changed; if there is a situation where the food safety and hygiene management and protection system of the facility is significantly affected due to relocation of the production site, change of legal representative, change of registration number granted by the country (region), etc., the General Administration of Customs will not make the change and will notify the facility

to re-apply for registration. The registration number in China will become invalid from the date of notification.

**Article 21:** Upon expiration of a facility's registration, the registration will be automatically renewed for a period of five years, except in any of the following circumstances:

- (1) The imported food is included in the list of foods for which automatic renewal is not permitted;
- (2) The facility is in the process of rectification due to non-compliance with registration requirements;
- (3) The General Administration of Customs has, in accordance with the law, suspended the import of relevant foods from the country (region) where the overseas producer of the imported food is located.

The list of imported foods for which automatic renewal of registration is not permitted as provided in the first item of the preceding paragraph shall be announced separately by the General Administration of Customs.

**Article 22:** Overseas producers of foods included in the list of foods for which automatic renewal of registration is not permitted who need to renew their registration shall submit a renewal application to the General Administration of Customs through the registration application channel within three to twelve months prior to the expiration of their registration.

The renewal application materials shall include:

- (1) Renewal application information;
- (2) A statement of commitment to continue to meet the registration requirements;
- (3) Overseas producers of listed foods shall also submit a statement of continued compliance with the registration requirements issued by the competent authorities of their country (region).

The General Administration of Customs will renew the registration of facilities that meet the registration requirements, and the registration validity period will be extended by 5 years.

**Article 23:** If a registered overseas producer of imported food falls under any of the following circumstances, the General Administration of Customs shall cancel its registration, notify the overseas producer, inform the competent authorities of the country (region) where it is located, and make the cancellation public:

- (1) Failure to apply for registration renewal in accordance with regulations;
- (2) The competent authorities of the country (region) where it is located or the overseas producer of imported food voluntarily applies for cancellation;
- (3) No longer meets the requirements of Article 7, Paragraph 1, Item 1 of these Regulations.

**Article 24:** The competent authorities of the country (region) where the overseas producer of imported food is located shall fulfill their food safety regulatory responsibilities, effectively supervise registered producers, and urge them to continuously meet registration requirements. If non-compliance is discovered, they shall immediately implement risk prevention and control and mitigation measures, suspend the relevant producer's food exports to China, and notify the

General Administration of Customs, supervising the producer to rectify the situation until it meets the registration requirements.

If an overseas producer of imported food discovers non-compliance with registration requirements, it shall voluntarily suspend food exports to China and immediately implement corrective measures until it meets the registration requirements.

**Article 25:** If the General Administration of Customs discovers that a registered overseas food producer no longer meets the registration requirements, it shall order the producer to rectify the situation within the prescribed time limit and notify the competent authorities of the producer's country (region) to supervise the rectification. During the rectification period, the producer's food imports shall be suspended.

After the producer completes the rectification, it shall submit a supervision and rectification report issued by the competent authorities of the producer's country (region) and a written statement of compliance with the registration requirements.

The General Administration of Customs shall review the producer's rectification and, if it meets the requirements, resume food imports from the producer.

**Article 26:** If the General Administration of Customs suspends or resumes food imports from registered overseas food producers in accordance with Articles 24 and 25 of these Regulations, the list of the relevant producers shall be published by the General Administration of Customs.

**Article 27:** If a registered overseas producer of imported food falls under any of the following circumstances, the General Administration of Customs shall revoke its registration and make a public announcement:

- (1) A major food safety incident involving imported food occurs due to the producer's own fault;
- (2) Food exported to China is found to have serious food safety issues during entry inspection and quarantine, and the circumstances are serious;
- (3) The producer has major problems with its food safety and hygiene management and cannot guarantee that the food exported to China meets the safety and hygiene requirements;
- (4) The producer still does not meet the registration requirements after rectification;
- (5) The producer provides false materials or conceals relevant circumstances;
- (6) The producer refuses to cooperate with the General Administration of Customs in conducting re-inspections and accident investigations;
- (7) The producer rents, lends, transfers, resells, or fraudulently uses its registration number;
- (8) The producer grants registration to a facility that does not have the application qualifications or does not meet the registration requirements;
- (9) Other circumstances that may revoke registration in accordance with the law.

#### **Chapter IV Supplementary Provisions**

**Article 28:** If the General Administration of Customs suspends the import of relevant food from the country (region) where an overseas food producer is located, the General Administration of



Customs will not accept registration applications from the relevant food producer in that country (region) during the suspension period.

**Article 29:** If the relevant country (region) and China have other agreements regarding the registration and management of overseas producers of imported food, the agreement between the two parties shall prevail.

**Article 30:** The scope of overseas storage facilities for imported food subject to registration and management in accordance with these Provisions shall be separately announced by the General Administration of Customs.

The registration and management of overseas producers of primary edible agricultural products shall be separately formulated by the General Administration of Customs.

The management requirements for overseas producers of imported food for cross-border e-commerce retail sales shall be handled in accordance with relevant regulations.

**Article 31:** The competent authorities of the country (region) in these Provisions refer to the official authorities responsible for food production safety and hygiene supervision in the country (region) where the overseas producer of imported food is located.

**Article 32:** The General Administration of Customs shall be responsible for interpreting these Provisions.

**Article 33:** These Provisions shall come into force on June 1, 2026. At that time, the "Regulations on the Registration and Administration of Overseas producers of Imported Food of the People's Republic of China," promulgated by the General Administration of Customs as Decree No. 248 on April 12, 2021, will be repealed.

**END UNOFFICIAL TRANSLATION**

**Attachments:**

[Interpretation of the Regulations on the Registration and Administration of Overseas Producers of Imported Food.docx](#)