

Voluntary Report – Voluntary - Public Distribution

Date: April 21, 2025

Report Number: CH2025-0089

Report Name: National Food Safety Standard for Cream Butter and Anhydrous Milk Fat Finalized

Country: China - People's Republic of

Post: Beijing

Report Category: FAIRS Subject Report, Dairy and Products, Sanitary/Phytosanitary/Food Safety, WTO Notifications, Trade Policy Monitoring

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Report Highlights:

On March 27, 2025, The People's Republic of China (China's) National Health Commission (NHC) and the State Administration for Market Regulation (SAMR) jointly released the National Food Safety Standard for Cream, Butter, and Anhydrous Milk Fat (GB 19646-2025). The standard applies to cream, butter, and anhydrous milk fat products sold in China. The final standard will enter into force on March 16, 2026. China notified the draft standard to the WTO on June 16, 2021. This report provides unofficial translation of the final standard. Stakeholders should conduct their own review of the regulations to assess any market or regulatory effect on their business.

FAS China provides this analysis and reporting as a service to the United States agricultural community, and to our farmers, ranchers, rural communities, and agribusiness operations in support of a worldwide agricultural information system and a level playing field for U.S. agriculture.

Summary:

On March 27, 2025, The People's Republic of China (China's) National Health Commission (NHC) and the State Administration for Market Regulation (SAMR) jointly released the National Food Safety Standard for Cream, Butter, and Anhydrous Milk Fat ([GB 19646-2025](#)) (link in Chinese). This standard applies to cream, butter, and anhydrous milk fat products produced and sold in China.

On June 16, 2021, China notified the draft standard to the WTO under [G/SPS/N/CHN/1221](#). The final standard will enter into force on March 16, 2026, and will replace the current standard of GB 19646-2010 which entered into force since December 2010.

This report provides an unofficial translation of the final standard. Stakeholders should conduct their own review of the regulations to assess any market or regulatory effect on their business.

BEGIN TRANSLATION

National Food Safety Standard

Cream, Butter, and Anhydrous Milk Fat

Foreword

The Standard replaces GB 19646-2010 the National Food Safety Standard Cream, Butter, and Anhydrous Milk Fat.

Compared with GB 19646-2010, the standard mainly has the following changes:

- Modified terminology and definitions;
- Modified sensory requirements;
- Modified physical and chemical indicators;
- Modified microbial limits;
- Added "Others" under Article 4.

National Food Safety Standard

Cream, Butter, and Anhydrous Milk Fat

1 Scope

The standard applies to cream, butter, and anhydrous milk fat.

2 Terms and Definitions

2.1 Cream

2.1.1 Cream

The product with a fat content of 10.0g/100g~80.0g/100g, obtained from processing the fat-containing part separated from raw milk, with or without adding food additives.

2.1.2 Modified Cream

The product with a fat content of 10.0g/100g~80.0g/100g, obtained from processing one or more ingredients of raw milk, cream, butter, or anhydrous milk fat as the main raw materials, with one or more other ingredients (excluding non-milk fat), food additives, and nutrition fortification substances added.

2.2 Butter

The product with a fat content of not less than 80.0g/100g, obtained through processing one or more ingredients of raw milk, cream, and anhydrous milk fat as the main raw materials, with or without adding other raw materials (excluding non-milk fat) and food additives.

2.3 Anhydrous Milk Fat

A product with a fat content of not less than 99.8g/100g, obtained through processing one or more ingredients of raw milk, cream, and butter, with or without food additives.

3. Technical Requirements

3.1 Raw material requirements

3.1.1 Raw milk: should comply with the provisions of GB19301¹.

3.1.2 Other raw materials: should comply with the corresponding food standards and relevant regulations.

3.2 Sensory requirements

Sensory requirements should comply with the provisions of Table 1.

¹ National Food Safety Standard for Raw Milk.

Table 1: Sensory Requirements

| Item | Requirements | Testing Method |
|-------------|--|---|
| Color | Milky white, milky yellow, or color of corresponding auxiliary materials. | Take an appropriate amount of sample and place it in a 50 mL beaker. Observe the color and texture under natural light. Smell its odor, rinse your mouth with warm water, and taste it. |
| Taste, odor | It has the taste and smell of cream, modified cream, butter, anhydrous milk fat or corresponding auxiliary materials, and has no abnormal smell. | |
| Status | Basically uniform, with the corresponding auxiliary material sediment allowed, and no visible foreign object. | |

3.3 Physical and Chemical Indicators

The physical and chemical indicators shall comply with the provisions in Table 2.

Table 2: Physical and Chemical Indicators

| Item | Indicator | | | Testing Method |
|---|-----------------------|--------|--------------------|--|
| | Cream, Modified cream | Butter | Anhydrous Milk Fat | |
| Water content / (g/ 100 g) ≤ | -- | 16.0 | 0.1 | Butter shall be tested according to GB 5009.3; anhydrous milk fat shall be tested according to Karl Fischer method in GB 5009.3. |
| Fat / (g/100 g) ≥ | 10.0 | 80.0 | 99.8 | Anhydrous milk fat shall be tested according to [100-water content (g/100g)] in GB 5009.6. |
| Acidity ^a /(°T) ≤ | 30.0 | 20.0 | -- | GB 5009.239 |
| ^a not applicable to products that are processed through fermentation or acidity adjustments. | | | | |

3.4 Contaminant Limits and Mycotoxin Limits

3.4.1 The limits of contaminants shall comply with provisions of GB 2762².

3.4.2 The limits of mycotoxin shall comply with provisions of GB 2761³.

3.5 Microbiological Limits

² National Food Safety Standard Maximum Levels of Contaminants in Foods ([GB2762-2022](#))

³ National Food Safety Standard for Maximum Levels of Mycotoxins in Foods ([GB2761-2017](#))

3.5.1 It should meet the commercial sterilization requirements of cream products and be tested according to the methods specified in GB4789.26.

3.5.2 The pathogenic bacteria limits of products produced by other processes shall comply with the provisions of GB 29921⁴, and the other microbial limits shall comply with the provisions of Table 3.

Table 3: Microbiological Limits

| Item | Sampling plan ^a and limits (if not specified, shall be expressed with CFU/g) | | | | Testing methods |
|--|---|----------|-----------------|-----------------|-----------------|
| | <i>n</i> | <i>c</i> | <i>m</i> | <i>M</i> | |
| Total bacterial count ^b | 5 | 2 | 10 ⁴ | 10 ⁵ | GB 4789.2 |
| Coliform group | 5 | 2 | 10 | 10 ² | GB 4789.3 |
| Mold ≤ | 90 | | | | GB 4789.15 |
| ^a Collection and treatment of samples shall be carried out according to GB 4789.1 and GB 4789.18. | | | | | |
| ^b not applicable to products with fermentation processes. | | | | | |

3.6 Food Additives and Nutritional Fortification Substances

3.6.1 Use of food additives shall comply with provisions of GB 2760⁵.

3.6.2 Use of food nutritional fortification substances shall comply with provisions of GB 14880⁶.

4 Other

4.1 The product category should be indicated on the product label of cream. Fermented cream and blended cream should be labeled as fermented cream and fermented blended cream; artificially acidified cream and blended cream should be labeled as acidified cream and acidified blended cream.

4.2 “奶油” can also be called “黄油”, and anhydrous “奶油” can also be called anhydrous “黄油” or anhydrous “乳脂”.

END TRANSALTION

Attachments:

[GB 19646-2025 cream butter and anhydrous milk fat.pdf](#)

⁴ National Food Safety Standard for Limits of Pathogens in Pre-packaged Foods ([GB29921-2021](#))

⁵ National Food Safety Standard Usage Standard for Food Additives ([GB2760-2024](#))

⁶ National Food Safety Standard Use of Nutritional Fortification Substances ([GB14880-2012](#))