

Voluntary Report – Voluntary - Public Distribution

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Report Name: National Food Safety Standard for Modified Milk Notified

Country: China - People's Republic of

Post: Beijing

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

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Report Highlights:

On August 29, 2025, China notified a National Food Safety Standard for Modified Milk to the WTO under G/SPS/N/CHN/1287/Add.1. This national food safety standard includes a definition, requirements for raw materials, chemical and physical indicators, contaminant limits, and labeling for modified milk products. This report provides an unofficial translation of the notified draft standard. Comments may be submitted to China's SPS National Notification and Enquiry Center at sps@customs.gov.cn until October 28, 2025.

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 August 29, 2025, the People's Republic of China (China) notified the National Food Safety Standard for modified milk to the World Trade Organization (WTO) under [G/SPS/N/CHN/1287/Add.1](#). Once finalized, it will replace the current regulation of GB 25191-2010 which was implemented in December 2010.

China previously notified the draft to the WTO under [G/SPS/N/CHN/1287](#) on October 25, 2023. Please see FAS GAIN Report [CH2023-0155](#) for more detailed information. Compared with the previous notification, the new draft includes the following revisions:

- Regulated flavored condensed milk cannot be used as the ingredient,
- Removed “allowing small amount of fat to float on top of the product” under sensory requirements,
- Adjusted labeling requirements under Article 4;
- Clarified that this Standard does not apply to liquid products made from raw milk with only lactase added.

This report provides an unofficial translation of the notified standard. Comments may be submitted to China's SPS National Notification and Enquiry Center at sps@customs.gov.cn until October 28, 2025. Stakeholders should conduct their own review of the regulations to assess any market or regulatory impact on their business.

BEGIN UNOFFICIAL TRANSLATION

National Food Safety Standard Modified Milk (draft for comments)

Forword

This standard replaces GB 25191-2010, National Food Safety Standard Modified Milk.

Compared with GB 25191-2010, this standard features the following major changes:

- Revised Scope;
- Revised terms and definitions;
- Updated applicable test methods for physical and chemical indicators;

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- Revised microbial limits, pathogenic bacteria limits directly refer to provisions of GB 29921;
- Revised “Other” section.

1. Scope

This standard applies to modified milk.

This standard does not apply to liquid products made from raw milk with only lactase added.

2. Terms and Definitions

2.1 Modified milk

Liquid products made with one or more of raw milk, concentrated dairy products (excluding flavored condensed milk), or milk powder as the main raw material, with addition of one or more of other raw materials, food additives, and nutritional fortifiers, and processed through sterilization or other processes, where the milk solids content from the main raw materials is not less than 80%.

3. Technical Requirements

3.1 Raw materials requirements

3.1.1 Raw milk shall comply with the requirements of GB 19301.

3.1.2 Concentrated dairy products shall comply with the requirements of GB 13102.

3.1.3 Milk powder shall comply with the requirements of GB 19644.

3.1.4 Other raw materials shall comply with relevant food standards and regulations.

3.2 Sensory requirements

Sensory requirements should follow Table 1.

Table 1: Sensory Requirements

Item	Requirement	Testing Method
Color	It shall have the characteristic color of modified milk.	Place an appropriate amount of sample in a 50 mL beaker and observe its color and texture under natural light and smell it. Rinse your mouth with warm water and taste it.
Taste and odor	It shall have aroma of modified milk and have no abnormal odor.	
Status	It is a uniform liquid with no clots, may contain sediment of excipients that are consistent with the formula, and no visible foreign object.	

3.3 Physical and chemical indicators

Physical and chemical indicators should comply with provisions in Table 2.

Table 2: Physical and Chemical Indicators ^a

Item	Indicator	Testing Method
	Modified Milk	
Fat ^b g/100g ≥	2.5	GB 5009.6
Protein, g/100g ≥	2.3	GB 5009.5
^a It is only applicable to products produced with one or more of raw bovine (or goat) milk, concentrated dairy products, or bovine (or goat) milk powder as the primary raw material.		
^b It is only applicable to whole-fat products.		

3.4 Contaminants limits and mycotoxin limits

3.4.1 Contaminants limits should follow the provisions of GB 2762.

3.4.2 Mycotoxin limits should follow the provisions of GB 2761.

3.5 Microbial limits

3.5.1 Products produced under commercial sterilization conditions should meet the requirements of commercial sterility and be tested according to the methods specified in GB 4789.26.

3.5.2 Pathogenic bacteria limits of other products should follow provisions of GB 29921. Microbial limits should comply with requirements of Tabel 3.

Table 3: Microbial Limits

Item	Sampling protocol ^a and limit				Testing method
	n	c	m	M	
Total bacteria count	5	2	5.0x10 ⁴	1.0x10 ⁵	GB 4789.2
Coliform group	5	2	1	5	GB 4789.3
^a Collection and processing of samples shall be carried out in accordance with GB 4789.1 and GB 4789.18.					

3.6 Food additives and nutritional fortification substances

3.6.1 The use of food additives must comply with the provisions of GB 2760.

3.6.2 The use of food nutritional fortification substances must comply with the provisions of GB 14880.

4. Others

4.1 Modified milk produced entirely with milk powder should be labeled “reconstituted dairy (复原乳)” or “reconstituted milk (复原奶)” adjacent to the product name; modified milk produced

partially with milk powder should be labeled “contains ××% reconstituted dairy” or “contains ××% reconstituted milk” adjacent to the product name.

Note: “××%” refers to the mass fraction of milk solids from the added milk powder relative to the total milk solids in the modified milk.

4.2 “Reconstituted dairy” or “reconstituted milk” should be displayed on the same display panel as the product name on the packaging container. The words “reconstituted dairy” or “reconstituted milk” should be prominently displayed, with a font size no smaller than that of the product name and a height no less than one-fifth the height of the main display panel.

4.3 The product name may include descriptive terms regarding fat content, such as “skimmed,” “partially skimmed,” and “whole fat.”

4.4 Liquid products made from raw milk with only lactase added should adhere to the corresponding standards based on their production process.

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Attachments:

[CHN1287add1 Modified milk.pdf](#)