

Voluntary Report – Voluntary - Public Distribution

Date: April 14, 2026

Report Number: CH2026-0047

Report Name: GACC Decree 280 - Imported Food Registration Risk
Evaluation

Country: China - People's Republic of

Post: Beijing

Report Category: FAIRS Subject Report, WTO Notifications, Trade Policy Monitoring

Prepared By: FAS China Staff

Approved By: Eric Mullis

Report Highlights:

On March 26, 2026, China submitted a WTO notification G/TBT/N/CHN/1964/Add.2 regarding the implementation of the Regulations of the People's Republic of China on the Customs Administration of Registration of Overseas Manufacturers of Imported Food. This notification introduces China's risk assessment report to justify its regulatory framework for overseas facility registration. This report provides an unofficial translation of the risk assessment.

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.

On March 26, 2026, China submitted a WTO notification [G/TBT/N/CHN/1964/Add.2](#) regarding the implementation of the *Regulations of the People's Republic of China on the Customs Administration of Registration of Overseas Manufacturers of Imported Food*. Following Announcement 27 (2026), this notification introduces a risk assessment report issued by the General Administration of Customs of China (GACC), which serves to justify its revised regulatory framework for overseas facility registration. Through this assessment, GACC outlines its evaluations for 18 specific categories of imported food, establishing GACC's position on two primary registration policies: the requirement for an "official recommendation" from the exporting government and the eligibility for "automatic renewal" of manufacturer registrations.

According to the notification, GACC asserts that an official recommendation for registration must be mandated for products GACC deems to possess high food safety risks, such as high rates of import rejection or a history of major safety incidents. GACC further claims that such oversight is necessary to align with international norms. Regarding renewals, GACC asserts that automatic extension should be denied if GACC determines it must manually audit an exporting country's regulatory system, verify a manufacturer's safety management protocols, or if the data requires frequent updates.

Official Recommendation for Registration: GACC mandates that 17 of the 18 assessed categories require an "official government recommendation." GACC justifies this by claiming these categories carry high risks of animal disease transmission, pest infestation, or sanitary issues. GACC concludes that frozen fruits are the only category exempt from this requirement, asserting that rapid freezing processes mitigate pest risks enough to allow for independent manufacturer registration.

Automatic Renewal Eligibility: GACC specifies that 16 of the 18 categories are eligible for automatic 5-year renewals, asserting that their processing methods and production capacities are sufficiently fixed to not require constant re-evaluation. However, GACC insists that meat and meat products, as well as bird's nests, are ineligible for this facilitation. GACC rationalizes this exclusion by pointing to what it identifies as severe quarantine risks and high failure rates for meat, and fluctuating production capacities and potential adulteration risks for bird's nests.

For additional information on Decree 280 and Announcement 27 (2026), please see GAIN Reports [CH2025-0204](#) and [CH2026-0034](#), respectively. Decree 280 is set to take effect on June 1, 2026.

BEGIN UNOFFICIAL TRANSLATION

Materials for Risk Assessment of Relevant Products under the
“Regulations of the People's Republic of China on the Registration Administration of Overseas
Producers of Imported Food”

Bureau of Import and Export Food Safety

March 2026

Table of Contents¹

I. Assessment Criteria.....	1
II. Product Catalog and Evaluation Conclusions.....	2
III. Risk Assessment Materials for Relevant Products.....	3
(I) Meat and Meat Products.....	3
(II) Casings.....	5
(III) Bird's Nests and Bird's Nest Products.....	7
(IV) Bee Products.....	9
(V) Eggs and Egg Products.....	10
(VI) Edible Oils	12
(VII) Stuffed pastry products	16
(VIII) Rice.....	17
(IX) Grain Milling Industrial Products and Malt.....	19
(X) Dehydrated Vegetables.....	22
(XI) Seasoning Powders.....	23
(XII) Nuts and Seeds.....	25
(XIII) Dried Fruits.....	27
(XIV) Special Dietary Food.....	27
(XV) Functional Foods.....	29
(XVI) Dairy Products.....	30
(XVII) Aquatic Products.....	32
(XVIII) Frozen Fruit.....	34

¹ The page numbers in the Table of Contents correspond to the original Chinese language document and do not align with the page numbers of this report.

I. Assessment Criteria

(I) For products included in the “Catalog of Food Products Requiring Official Recommendation Letters for Registration”, the following factors are primarily taken into consideration:

1. The relevant products pose a high food safety risk, and the incidence of non-compliance among imports is significantly higher than the average level;
2. The relevant product category has been associated with major food safety incidents that have attracted significant public attention;
3. Adherence to internationally accepted practices.

(II) For products included in the “List of Food Products Not Eligible for Automatic Registration Renewal,” the following factors are primarily taken into consideration:

1. Information submitted by the manufacturers of the relevant products requires periodic updates and must undergo manual review and verification—such as credentials or materials regarding filing/registration obtained by the enterprise from other regulatory authorities;
2. The overseas official regulatory system and its implementation status must undergo manual review and verification;
3. The enterprise's quality and safety management system and its implementation status must undergo manual review and verification;
4. Regional, industry-wide, or systemic emergency incidents involving the relevant products have occurred within the exporting country.

II. Product Catalog and Assessment Conclusions

No.	Product Category	Requires Official Recommendation/Registration	Eligible for Automatic Renewal
1	Meat and meat products	Yes	No
2	Casings	Yes	Yes
3	Bird's nest and Bird's nest products	Yes	No
4	Bee products	Yes	Yes
5	Eggs and egg products	Yes	Yes
6	Edible oil	Yes	Yes
7	Stuffed pastry products	Yes	Yes
8	Rice	Yes	Yes
9	Grain milling industrial products and malt	Yes	Yes
10	Dehydrated vegetables	Yes	Yes
11	Seasoning Powders	Yes	Yes
12	Nuts and seeds	Yes	Yes
13	Dried fruits	Yes	Yes
14	Special Dietary Foods	Yes	Yes
15	Functional foods	Yes	Yes
16	Dairy	Yes	Yes
17	Aquatic products	Yes	Yes
18	Frozen fruit	No	Yes

III. Materials for Related Product Risk Assessment

(I) Meat and Meat Products

1. General Overview.

China is a major importer and consumer of meat and meat products. As of November 27, 2025, a total of 4,127 overseas production facilities (including those with suspended status) across 43 countries and regions have obtained registration. As a staple food item, meat and meat products are consumed by virtually the entire population; given their wide scope of application and their direct bearing on the national economy and public livelihood, their quality and safety status is of paramount importance.

2. Product Risk Analysis.

First, meat and meat products present a high-risk regarding food safety. In terms of raw material sources, both meat and meat products are derived from live livestock and poultry. Due to inherent species-specific attributes, these animals may carry various pathogens—such as Foot-and-Mouth Disease (FMD), Bovine Spongiform Encephalopathy (BSE), and highly pathogenic Avian Influenza—thereby posing varying degrees of risk for the transmission of animal epidemics and diseases. Regarding production and processing techniques, chilled and frozen meat products undergo physical processing, typically involving pre- and post-slaughter inspection and quarantine, slaughtering and dressing, cleaning and decontamination, and cooling. Although veterinary professionals conduct clinical inspections during the processing workflow, the efficacy of these measures relies heavily on the veterinarians' individual experience and sense of responsibility. Furthermore, neither the overall production environment nor the freezing process can guarantee the complete elimination of pathogen risks from every single carcass. Offal products, in particular, carry a higher risk profile than standard meat cuts; consequently, the overall risk associated with this level of processing is classified as high. Cured and cooked meat products are generally classified as presenting a medium risk. Regarding transportation and storage, the shipment of meat products is subject to strict temperature control requirements: frozen meats typically require temperatures of -15°C or lower, while chilled meats generally require temperatures between 0°C and 4°C . For cooked and cured meats, transportation temperature requirements vary depending on the degree of processing and packaging method used; however, they almost invariably require refrigerated or frozen storage—rarely are they suitable for storage at ambient temperatures. Consequently, the risk factors associated with the transportation phase of meat products are relatively high. Finally, in terms of consumer demographics, meat products are consumed by a broad cross-section of the population, meaning that issues regarding their quality and safety have a wide-ranging impact.

Second, meat and meat products exhibit a high rate of non-compliance. From 2022 to 2024, the General Administration of Customs of China (GACC) publicly announced that 2818, 2358, and 4199 batches of food products, respectively, were denied entry. Among these, meat and meat products accounted for 256, 241, and 798 denied batches, representing 9.1%, 10.2%, and 19% of the total denied food products in each respective year. Based on data regarding trade with China and non-compliance issues among registered import food enterprises from January 2022 to December 2023: out of 40 countries and regions engaged in food trade with China, 29 (72.5%) experienced instances where their products were deemed non-compliant and denied entry; similarly, out of 2236 meat enterprises registered to export to China, 227 (10.2%) faced product non-compliance issues resulting in denied entry. In 2024, a total of 798 batches—amounting to 6199.6 tons—of meat and meat products nationwide were denied entry. This represented year-on-year increases of 2.3-fold and 94.5%, respectively, indicating a significant rise in non-compliance issues regarding imported meat products. The primary reasons for non-compliance included discrepancies between goods and documentation, detection of animal diseases, failure

to pass sensory inspections, excessive residues of agricultural and veterinary drugs, microbial contamination exceeding limits, and failure to obtain necessary inspection and quarantine market access approvals.

Thirdly, implementing strict regulatory oversight on meat products is a common international practice. Regarding chilled, frozen, and cured meats: the United States implements a system of national-level market access approval combined with enterprise registration; the European Union requires both product-specific and national-level market access approvals, alongside enterprise registration; Australia implements product-specific and national-level market access approvals (publicly listed in the Australian BICON database) and requires specific quarantine entry permits—necessitating the application for an import license—for certain products; Japan requires the signing of bilateral agreements with exporting countries prior to importation, as well as the procurement of an import license before customs clearance. Regarding cooked meat products, the United States implements a system of national market access and enterprise registration; the European Union implements product- and country-specific market access, as well as enterprise registration; and Australia implements product- and country-specific market access (as published in the Australian BICON database), while subjecting certain products to specific quarantine entry permits requiring the submission of an import license application. Japan, for its part, requires the signing of a bilateral agreement with the exporting country prior to importation; furthermore, it mandates the registration of enterprises producing heat-processed foods and requires the procurement of an import license prior to customs clearance.

3. Assessment Conclusions and Recommendations

Based on a comprehensive assessment, imported meat and meat products are deemed to carry a high risk, with a notably high incidence of non-compliance. Moreover, in accordance with international norms, the implementation of both country- and product-specific market access and enterprise registration is deemed necessary. Consequently, meat and meat products should be subject to administrative requirements mandating official recommendation for registration, with automatic renewal of registration explicitly disallowed.

(II) Casings

1. General Overview.

China is a major global hub for the processing of natural casings. All imported casings enter the country under a "processing with supplied materials" trade arrangement. To date, 213 enterprises across 11 countries or regions have obtained registration for export to China; these source countries are diverse, and the number of registered enterprises is substantial.

2. Product Risk Analysis.

First, imported casings present a relatively high safety risk. In terms of raw material sources, imported casings are derived primarily from the intestines of pigs and sheep. Due to species-specific biological characteristics, these raw materials may harbor various pathogens—such as those causing African Swine Fever (ASF), Foot-and-Mouth Disease (FMD), and Bovine Spongiform Encephalopathy (BSE)—thereby posing varying degrees of risk regarding the transmission of animal epidemic diseases. Although the animals supplying these raw materials are subject to mandatory ante-mortem and post-mortem inspections by official veterinarians, such measures can only mitigate, but not entirely eliminate the risk of disease transmission. Consequently, the possibility remains that the casings may still harbor pathogens. Regarding production and processing techniques, the casings currently imported into China fall primarily into two categories: salted casings and frozen casings. Both types undergo preliminary cleaning and scraping processes; salted casings are subsequently treated with edible salt, while frozen casings undergo a freezing process. While cleaning and scraping effectively remove intestinal contents, and salting processes that comply with WOA (World Organization for Animal Health) standards can inactivate relevant pathogens, risks persist during the production phase. These risks include insufficient salting, improper scraping, or incomplete removal of specific hazardous substances, leaving open the possibility that animal diseases could still be introduced into China via these casing products. Furthermore, freezing environments do not completely eliminate the risk posed by disease pathogens; consequently, frozen casings are considered to carry a higher risk than salted casings. Regarding transportation and storage, casings are typically packaged in plastic drums or cardboard cartons. If warehouse management protocols are lax—specifically if casings destined for China are stored in close proximity to other unrelated products—there is a risk of cross-contamination and the transmission of animal diseases. Finally, regarding the consumer base, the majority of casings imported into China are processed for re-export—primarily for use in sausage production—and ultimately reach a broad spectrum of consumers.

Second, instances of non-compliance and product defects are occasionally detected. From January 2022 to December 2023, five batches of non-compliant products were intercepted at border ports. Of these, three batches involved the entry of products that had not obtained market access approval; one batch involved a discrepancy between the cargo and its accompanying documentation; and one batch contained contents posing a quarantine risk.

Third, this approach aligns with international best practices. Implementing a registration system for overseas manufacturers of casings is a widely accepted international practice; currently, the European Union, the United States, Japan, the United Kingdom, and other nations all require China to officially recommend and register their respective casing manufacturers.

3. Assessment Conclusions and Recommendations

Implementing a registration system for overseas casing manufacturers ensures that only products from facilities meeting China's specific requirements regarding production conditions and hygiene control standards are permitted for export to China, thereby enhancing food safety at the source. This measure represents a long-standing and standard regulatory practice employed by China in its oversight of imported casings. Furthermore, by mandating registration with China for overseas manufacturers, this initiative plays a constructive role in reinforcing the primary responsibility of these manufacturers and encouraging greater regulatory proactivity on the part of their respective competent authorities.

Based on the foregoing analysis, it is recommended that the current system—requiring official recommendation for the registration of casing manufacturers—be maintained. Given that the processing standards and production capacities associated with casings remain relatively stable, they satisfy the criteria set forth in Article 21 of the “Provisions on the Administration of Registration of Overseas Manufacturers of Imported Foods”—specifically, the condition that "registration information may be automatically renewed in the absence of significant changes." Consequently, it is recommended that casings be included in the list of food products eligible for automatic registration renewal.

(III) Bird's Nests and Bird's Nest Products

1. General Overview.

According to industry estimates, the global production of bird's nests is projected to reach approximately 2,500 tons in 2024. Of this total: Indonesia accounts for approximately 1,500 tons; Malaysia accounts for approximately 500 tons; and other Southeast Asian nations—such as Thailand, Singapore, Vietnam, and Cambodia—collectively account for the remaining 500 tons. Globally, over 10 species of birds belonging to the genera “Aerodramus”, “Collocalia”, and “Apus” are capable of producing bird's nests; however, the bird's nest products available on the market are primarily derived from the Javan swiftlet (“Aerodramus fuciphagus”) and the edible-nest swiftlet (“Aerodramus maximus”)—both members of the genus “Aerodramus”. Influenced by dietary culture, the primary consumers of bird's nest products are ethnic Chinese populations, and the major markets include mainland China, the Hong Kong and Taiwan regions of China, as well as other regions globally with significant Chinese communities.

Based on their degree of processing, bird's nest products are broadly categorized into three types: raw bird's nests (uncleaned), processed edible bird's nests, and bird's nest-based products. Among these, raw bird's nests and processed edible bird's nests are the specific categories subject to quarantine access management regulations.

As of March 2026, processed edible bird's nests from five countries—Indonesia, Malaysia, Thailand, Vietnam, and Cambodia—are authorized for export to China; additionally, raw bird's

nests from three countries—Malaysia, Vietnam, and Cambodia—are authorized for export to China.

2. Product Risk Analysis.

First: Excessive Nitrite Levels. In 2011, following the "Blood Nest" scandal that rocked the industry, China implemented a comprehensive suspension on bird's nest imports. The so-called "Blood Nests" were the result of illicit enterprises fumigating bird's nests with nitrites to artificially alter their color from white to red, while fabricating narratives claiming that red-colored nests possessed superior nutritional value. In recent years, the General Administration of Customs has dynamically adjusted its supervisory sampling and inspection protocols regarding nitrite levels. Furthermore, it has implemented strict measures—including the suspension of export eligibility to China—against overseas production facilities where excessive nitrite levels were detected. These measures have yielded tangible results. Supervisory sampling data indicate a continuous improvement in compliance regarding nitrite levels; over the past six years, a total of 19 batches of bird's nest products were found to contain excessive nitrite levels—specifically, 11 batches from Indonesia and 8 batches from Malaysia. In 2024, three batches of products from Indonesia were found to contain nitrite levels exceeding regulatory limits. Over the past four years, no instances of excessive nitrite levels have been detected in bird's nest products from Malaysia. Raw bird's nests naturally contain nitrites; however, given their high solubility in water, nitrite levels can be significantly reduced through proper processing and treatment. The occurrence of excessive levels indicates that some manufacturers are still failing to fully adhere to Standard Operating Procedures. In summary, nitrite content remains a critical risk factor in bird's nest products.

Secondly, there is the issue of excessive aluminum content. The industry pays close attention to the issue of excessive aluminum in bird's nest products. According to World Health Organization (WHO) guidelines, the provisional tolerable weekly intake (PTWI) of aluminum for humans is 2 mg per kilogram of body weight. Aluminum is a metal element characterized by low toxicity and chronic bioaccumulation; excessive intake can directly compromise human health. Based on risk analysis, the General Administration of Customs has initiated monitoring programs for aluminum content in bird's nest products. Since the beginning of 2024, abnormal aluminum levels have been detected in 23 batches of bird's nest products from 19 enterprises across Indonesia and Malaysia; this issue has emerged as a significant safety hazard associated with imported bird's nests.

Thirdly, there are risks related to animal diseases and epidemics. Currently, all countries authorized to export bird's nests to China are contending with outbreaks of highly pathogenic avian influenza or Newcastle disease. Consequently, products must undergo heat treatment—in accordance with relevant recommendations issued by the World Organization for Animal Health (WOAH)—before they can be exported to China. The parameters of heat treatment (specifically duration and temperature) constitute critical risk points; therefore, continuous vigilance is

required to ensure that foreign manufacturers are strictly implementing these protocols, alongside ongoing monitoring and testing efforts.

3. Assessment Conclusions and Recommendations

Based on a comprehensive assessment, imported bird's nest products currently present residual risks regarding both food safety and the potential transmission of animal diseases. Therefore, it is imperative to maintain strict, source-based regulatory oversight. It is recommended that the current registration mechanism for overseas bird's nest manufacturers—specifically, the requirement for official recommendation—be maintained.

Bird's nest processing is a labor-intensive industry wherein production capacity is primarily determined by the size of the workforce, leading to significant fluctuations in output volume. Furthermore, there is a high risk of "cross-trading" (unauthorized product diversion) among bird's nest enterprises. As enterprise registrations are subject to renewal upon expiration—requiring a re-inspection prior to extension—it is recommended that bird's nest products not be included in the list of food categories eligible for automatic registration renewal.

(IV) Bee Products

1. General Overview

China is the world's leading producer and trader of bee products. In 2023, China's annual honey output accounted for approximately one-quarter of the global total, while its export volume represented about one-fifth of the global trade volume. Currently, China permits the importation of bee products from 73 countries and regions, with a total of 280 foreign bee product manufacturing enterprises currently authorized to export to China.

Between 2022 and 2024, China's customs authorities identified 55 batches of imported bee products as non-compliant. Of these, 30 batches were rejected due to specific issues such as the detection of animal diseases, excessive levels of fructose and glucose, elevated counts of osmotolerant yeasts, or the presence of prohibited or restricted veterinary drugs exceeding permissible limits.

Currently, China implements a conditional market access management system for imported bee products, establishing unified and explicit inspection, quarantine, and food safety requirements. Bee products destined for China must be accompanied by a health certificate for every single batch. Customs authorities conduct regulatory oversight—including documentary review, on-site inspections, and laboratory testing—on imported bee products. Based on the results of these procedures, a conformity assessment is conducted; if deemed compliant, the products are released, and the necessary clearance certificates are issued.

Regulatory requirements for bee products vary across different nations. Currently, European Union member states and Saudi Arabia require that foreign bee product manufacturing

enterprises seeking to export to their markets undergo an official recommendation and registration process.

2. Product Risk Analysis

The processing of bee products typically involves relatively simple techniques—generally limited to basic physical processes such as heating and filtration—which cannot guarantee the complete elimination of risks associated with bee diseases. Furthermore, as bee products are animal-derived commodities, their quality and safety are significantly influenced by controls implemented at the source (apiary) level as well as during the subsequent production and processing stages. At the source—the apiary stage—risks to product safety may arise from toxic nectar-bearing plants, pesticide contamination, or the misuse of veterinary drugs. During the production, processing, storage, and transportation stages, improper control of factors such as moisture levels and temperature can also compromise the quality and safety of bee products.

Regulatory oversight of bee products is becoming increasingly stringent globally, with limits on agricultural residues, veterinary drug residues, and other contaminants being continuously tightened. Concurrently, driven by intensifying competition within the bee product market, instances of adulteration—such as the unauthorized addition of syrups or the illicit introduction of specific marker substances—have emerged as significant market risks. Global Countries worldwide pay close attention to the issue of adulteration in bee products—particularly honey—and are continuously exploring and adopting new technological methods (such as NMR) to detect such adulteration.

Quality and safety management practices among bee product manufacturers vary across different countries; consequently, there are disparities in food safety and hygiene control requirements among different enterprises. Furthermore, the level of understanding regarding China's laws, regulations, and national food safety standards varies among enterprises in different countries.

3. Assessment Conclusions and Recommendations

Based on a comprehensive assessment, regulating the import of bee products from the source is deemed both reasonable and necessary for China. Therefore, it is recommended that the current registration classification for overseas bee product manufacturers—specifically, "official recommendation for registration"—be maintained. Additionally, it is recommended that a system be implemented to allow for the automatic renewal of enterprise registrations upon their expiration.

(V) Eggs and Egg Products

1. General Overview.

As of the present, no foreign countries (or regions) have yet obtained market access approval for the export of eggs and egg products to China; consequently, no relevant foreign production enterprises have obtained registration qualifications from the General Administration of Customs of China (GACC). During the period from 2022 to 2024, as there were no imports of these specific products, no instances of non-compliance were detected.

The supervision of imported eggs and egg products strictly adheres to market access management regulations. Foreign production enterprises are required to obtain registration from the GACC; only products falling within their registered scope—and produced during the validity period of their registration—are permitted for export to China. Furthermore, all imported eggs and egg products must be accompanied by an official sanitary certificate issued by the exporting country (or region). This certificate must bear an official seal and be signed by an official veterinarian. The importation of fresh eggs specifically requires the acquisition of an “Entry Quarantine Permit for Animals and Plants” in accordance with the law, thereby ensuring that imported products meet China's inspection and quarantine requirements.

2. Product Risk Analysis.

First, the risks regarding food safety and disease transmission are prominent. Eggs and egg products primarily utilize fresh eggs as their raw material; as poultry species are prone to carrying pathogens such as avian influenza and Newcastle disease, there exists a potential risk of cross-border disease transmission. Products in this category have previously triggered multiple food safety incidents due to pathogen contamination—such as the 2017 European fipronil-contaminated egg scandal and the 2025 “Salmonella” outbreak linked to eggs in the United States—generating widespread social impact. The specific risk characteristics are as follows: First, risks associated with raw materials and processing are high; typically, fresh eggs undergo only surface cleaning and disinfection rather than deep sterilization, resulting in a significantly higher risk of pathogen carriage compared to other food products. Furthermore, the processing techniques applied to egg products have a profound impact on the effectiveness of pathogen inactivation; if these processes fail to meet the relevant inactivation standards stipulated in the “Terrestrial Animal Health Code”, the risks associated with the egg products persist. Second, risks associated with storage and transportation are high; these products require cold-chain storage and transport throughout the entire supply chain, and temperature fluctuations can easily facilitate pathogen proliferation, resulting in a relatively high risk level. Third, the scope of impact is broad; there are no specific restrictions on the consumer base for these products. Moreover, certain types of egg products do not undergo thermal processing, necessitating even more stringent safety control measures; consequently, the harm caused by non-compliant

products far exceeds that of ordinary food items, placing the risks to food quality and safety above the average level.

Second, these measures align with international regulatory practices. Major global trading entities generally implement strict import regulations regarding eggs and egg products. The European Union enforces a regulatory framework encompassing country-level approval, product-level approval, and enterprise registration; the United States employs a system of country-level approval and enterprise registration; while Australia and Japan both require compliance with dual conditions for country-level and product-level market access. Classifying the registration of overseas manufacturers of eggs and egg products as "officially recommended registration" aligns with internationally accepted principles of risk prevention and control.

3. Assessment Conclusions and Recommendations

Based on a comprehensive assessment, the food safety risks associated with imported eggs and egg products are deemed to be relatively high. Consequently, regulating these products at the source is both reasonable and necessary; it is therefore recommended that the registration of overseas manufacturers of eggs and egg products be designated as "officially recommended registration."

The registration information for overseas manufacturers of eggs and egg products consists primarily of static data—such as production qualifications and processing standards—and involves virtually no content requiring periodic updates. This profile meets the applicability criteria set forth in Article 21 of the “Administrative Provisions on Registration of Overseas Manufacturers of Imported Food“, which stipulates that "registration information may be automatically renewed in the absence of significant changes." Accordingly, it is recommended that eggs and egg products be included in the list of food categories eligible for automatic registration renewal.

(VI) Edible Oils

1. Edible Animal Fats.

(1) General Overview.

As of December 1, 2025, only edible pork fat and beef fat from the United States, and edible pork fat from the Netherlands, have been granted market access to China. A total of 675 overseas production facilities have been registered in China (672 from the United States and 3 from the Netherlands). Since 2023, there have been no imports of edible animal fats into China.

The General Administration implements strict market access management for edible animal fats, applying access procedures analogous to those for "processed meat products (cooked, cured, etc.)." Overseas production facilities must be registered with the General Administration of Customs; only products falling within their registered scope and produced during the validity

period of their registration are permitted for export to China. All edible animal fats exported to China must be accompanied by a sanitary certificate issued by the competent authority of the exporting country (or region); this certificate must bear an official seal and be signed by an official veterinarian.

(2) Product Risk Analysis.

First, the quarantine risk associated with raw materials is high. According to “GB 10146-2015 National Food Safety Standard: Edible Animal Fats“, edible animal fats are defined as "edible lard, beef tallow, mutton tallow, chicken fat, or duck fat rendered from the leaf fat, subcutaneous fat, omentum, or pure adipose tissue attached to the internal organs of pigs, cattle, sheep, chickens, or ducks." The raw materials for edible animal fats are similar to those for meat products, as both are derived from live livestock and poultry following slaughter and butchery. Furthermore, components such as omentum and visceral fat—which constitute some of these raw materials—are themselves categories of meat products that have not been granted market access. Consequently, the risk of these raw materials carrying epidemic diseases—such as Foot-and-Mouth Disease (FMD), Bovine Spongiform Encephalopathy (BSE), and highly pathogenic Avian Influenza—is uncontrollable, and they pose varying degrees of risk regarding the transmission of animal epidemic diseases.

Second, the safety and hygiene risks are high. In accordance with national standards such as “GB 10146-2015 National Food Safety Standard: Edible Animal Fats and Oils“, ”GB/T 46004-2025 Animal Fats and Oils: Beef Tallow“, and ”GB/T 8937-2023 Edible Animal Fats and Oils: Lard“, edible animal fats and oils are subject to specific quality and safety requirements regarding basic composition, physicochemical properties, contaminants, and veterinary drug residues. Furthermore, they entail stringent requirements concerning production processes, packaging methods, and storage and transport conditions; consequently, manufacturers must leverage processing technologies and management systems to effectively mitigate risks associated with raw material sourcing and potential residues.

Thirdly, the international community generally implements management systems involving product assessment and enterprise registration. The United States evaluates the animal disease status of exporting countries, mandates the issuance of official sanitary certificates, and verifies—as well as registers—whether production facilities in exporting countries comply with U.S. standards. Australia assesses the animal disease status of exporting countries and requires the issuance of official sanitary certificates; however, it imposes no registration or filing requirements on production facilities. Japan evaluates the animal disease status of exporting countries, explicitly designates prohibited countries or regions, requires the issuance of official sanitary certificates, and implements a registration management system for production facilities in exporting countries. The European Union evaluates the animal disease status of exporting countries, explicitly designates eligible countries or regions, requires the issuance of official

sanitary certificates, and mandates that production facilities be recommended for registration with the EU by the competent authorities of their respective host countries.

(3) Assessment Conclusions and Recommendations

Based on a comprehensive analysis, edible animal fats present relatively high risks regarding quarantine and sanitary safety, necessitating stringent controls over raw materials and production processes. Furthermore, implementing source-based supervision for edible animal fats aligns with international practices. Therefore, it is recommended that the registration of overseas production facilities for edible animal fats be designated as a category requiring official recommendation.

Given that the process standards and production capacities of overseas facilities manufacturing edible animal fats remain relatively stable, they meet the criteria stipulated in Article 21 of the “Administrative Provisions on Registration of Overseas Manufacturers of Imported Foods”—specifically, the condition that “registration information may be automatically renewed in the absence of significant changes.” Consequently, it is recommended that edible animal fats be included in the list of food products eligible for automatic registration renewal.

2. Edible Vegetable Oils.

(1) General Overview.

Edible vegetable oil is a bulk commodity of vital importance to the national economy and people's livelihood. It is an indispensable daily consumer product in the lives of the Chinese people, and its quality and safety have historically been a primary focus of public concern. In 2024, China imported 7.16 million tons of edible vegetable oils from over 60 countries. In particular, bulk edible vegetable oils, which involve large import volumes per batch, pose a significant risk: should quality or safety issues arise, the impact would be widespread, potentially triggering regional or even nationwide food safety incidents. Currently, Customs authorities implement an official recommendation-based registration system for overseas edible vegetable oil production enterprises; to date, 3,361 such enterprises across 77 countries and regions have successfully obtained registration to export to China.

(2) Product Risk Analysis.

First, inherent food safety risks within the product itself. Edible vegetable oils are oils produced from edible oil-bearing plant materials or crude vegetable oils. Their processing typically involves methods such as mechanical pressing or solvent extraction. According to the International Standards for Phytosanitary Measures (ISPM) No. 32, “Categorization of Commodities According to Their Pest Risk”, crude vegetable oils obtained through physical pressing carry a risk of pest infestation.

Second, there is a high incidence of non-compliance in imported edible vegetable oils. In recent years, analyses of non-compliant shipments indicate that the primary issues associated with imported edible vegetable oil products involve genetically modified (GM) ingredients, as well as elevated acid values and peroxide values. From 2022 to the present, China has identified 9 batches of imported edible vegetable oil with acid values exceeding regulatory limits and 5 batches with peroxide values exceeding limits, accounting for 17.7% of all non-compliant batches during this period. From 2024 to the present, a total of 24 batches of crude rapeseed oil were detected nationwide containing unauthorized GM ingredients, accounting for 45.3% of all non-compliant batches during this period.

Third, the occurrence of major safety incidents involving edible vegetable oils. Specifically, within the import process, incidents involving the contamination of bulk edible vegetable oils during transport have occurred in the past. For instance, in 2012, customs authorities at the ports of Taizhou and Zhangjiagang in Jiangsu Province detected excessive levels of toxic and harmful substances—specifically benzene and xylene (benzene-series compounds)—in multiple batches of bulk rapeseed oil imported from the United Arab Emirates and Canada. Investigations revealed that the contamination stemmed from residues of benzene and its homologs left over from the previous three voyages of the transport vessel. Consequently, the former General Administration of Quality Supervision, Inspection and Quarantine (AQSIQ) issued a public notice specifying the material requirements for transport vessels carrying imported bulk vegetable oils, as well as the requirements regarding the cargo carried during their three preceding voyages.

(3) Assessment Conclusions and Recommendations

Based on a comprehensive analysis, imported edible vegetable oils currently present risks regarding quarantine and food safety. Furthermore, given the immense volume of imports and domestic consumption, any issues that may arise would have widespread and far-reaching repercussions; consequently, the awareness of primary responsibility among business entities requires strengthening. To reinforce source control for vegetable oils—and to ensure that overseas government authorities and vegetable oil producers fully shoulder their responsibilities—it is recommended that the administrative requirements stipulated in Decree No. 248 be maintained, thereby continuing the requirement for official recommendation as a prerequisite for the registration of overseas producers of imported edible vegetable oils. Since the processing techniques and production capacities of edible vegetable oil producers remain relatively stable, they meet the applicable criteria set forth in Article 21 of the “Administrative Provisions on Registration of Overseas Manufacturers of Imported Food”—specifically, the provision stating that “registration information may be automatically renewed in the absence of any significant changes.” Accordingly, it is recommended that the registration of edible vegetable oil producers be automatically renewed.

(VII) Stuffed pastry products

1. General Overview.

Stuffed pastry products primarily consist of “baozi” (steamed buns), dumplings, spring rolls, and other quick-frozen grain-based products—whether containing meat or not. These products are typically manufactured using one or more grains—such as wheat, rice, or miscellaneous grains—and their derivatives as primary ingredients. These ingredients are often combined with various fillings or auxiliary ingredients, then subjected to mixing, processing, shaping, and quick-freezing. The fillings and auxiliary ingredients involved are complex in composition, with sources potentially encompassing legumes, tubers, livestock and poultry meat, eggs, raw milk, aquatic products, fruits and vegetables, edible fungi, and more.

Between 2022 and 2024, a total of 531 batches of imported filled Stuffed pastry products were recorded. Of these, one batch was identified as non-compliant during inspection, with the failure attributed to excessive microbial levels. Currently, Customs authorities implement an "official recommendation" registration system for overseas manufacturers of imported Stuffed pastry products; to date, 280 overseas manufacturing enterprises across 17 countries (or regions) have successfully obtained the necessary registration qualifications to export these products to China.

2. Product Risk Analysis.

First, the fillings within these Stuffed pastry products present certain safety risks. The primary risks associated with the inspection and quarantine supervision of this product category stem from the fillings, which frequently contain meat and egg ingredients. China enforces strict quarantine access management for processed meat and egg products; consequently, fillings containing animal-derived components—such as livestock and poultry meat or eggs—may harbor pathogens such as avian influenza viruses, Foot-and-Mouth Disease viruses, or Newcastle Disease viruses. If control measures during processing stages—such as raw material acceptance—are lax, there exists a risk that specific epidemic diseases could be introduced into China via the imported products. Furthermore, in accordance with Annex 2 of the “International Standards for Phytosanitary Measures (ISPM) 32: Categorization of Commodities According to Their Pest Risk”, Stuffed pastry products that have not undergone high-temperature cooking remain susceptible to pest infestation. Given the complex origins of the filling ingredients, specific components—such as peeled shrimp or eggs—also pose a potential allergenic risk to certain consumer groups.

Second, risks associated with product transportation and storage. Most Stuffed pastry products require storage and transport in refrigerated or frozen environments, typically within shipping containers. As these products are highly sensitive to fluctuations in temperature and humidity,

improper environmental control can easily lead to food spoilage and deterioration, thereby elevating the risk of contamination by pathogenic bacteria.

Third, other countries also impose "official recommendation" requirements on enterprises manufacturing Stuffed pastry products. Canada implements an official recommendation-based registration system for overseas manufacturers exporting meat-filled stuffed pastry products to the country. Chinese enterprises wishing to export meat-filled Stuffed pastry products to Canada must submit an application for overseas registration recommendation to their competent domestic customs authorities; the General Administration of Customs of China (GACC) then recommends these enterprises to the relevant Canadian authorities, leading to final approval.

3. Assessment Conclusions and Recommendations

Based on a comprehensive assessment—and considering the complex composition of the fillings and auxiliary ingredients in imported Stuffed pastry products, as well as the susceptibility of these products to contamination during transport and storage—it is recommended that the management requirements stipulated in Decree No. 248 be maintained. This approach aims to strengthen source control and reinforce the responsibilities of both overseas regulatory authorities and the manufacturing enterprises themselves by continuing to require official recommendations for the registration of overseas manufacturers of Stuffed pastry products. Furthermore, given that the processing techniques and production capacities for Stuffed pastry products are relatively stable, these products meet the criteria outlined in Article 21 of the “Provisions on the Administration of Registration of Overseas Manufacturers of Imported Food” (GACC Decree No. 248), which states that "registration information may be automatically renewed in the absence of significant changes." Therefore, it is recommended that the registration for Stuffed pastry products be automatically renewed.

(VIII) Rice

Under the “Regulations of the People's Republic of China on the Registration and Administration of Overseas Manufacturers of Imported Food” (Decree No. 248 of the General Administration of Customs), this product category was originally designated as "Edible Grains" and was listed as a product category officially recommended for registration. Currently, the "Edible Grains" category has been reclassified as "Rice."

1. General Overview

Rice encompasses brown rice, polished rice, and broken rice that have undergone milling processes and are free of husks and other impurities. Between 2022 and 2024, 21 batches were identified as non-compliant; of these, 16 batches failed quality inspections, with the primary issues being substandard quality and excessive heavy metal levels. Currently, China implements a quarantine access management system for rice; to date, 700 overseas rice production

enterprises across 16 countries (regions) have obtained the necessary registration qualifications to export to China.

2. Product Risk Analysis

First, the product presents a relatively high safety risk. If rice remains unprocessed or undergoes only minimal processing, it carries a high risk of harboring harmful organisms—particularly during the transportation and storage phases, when it is highly susceptible to infestation by storage pests. Conversely, highly processed rice—from which the bran, aleurone layer, and discolored grains have been removed—utilizes processing techniques capable of inactivating, to a certain extent, any pests, weed seeds, or other harmful organisms present in the grain; consequently, the quarantine risk associated with such rice is lower than that of unprocessed or minimally processed rice. According to Annex 2 of the “International Standards for Phytosanitary Measures: Classification of commodities according to their pest risk” (ISPM 32), rice falls into a category of processed commodities that remain susceptible to infestation by harmful organisms even after processing. Rice is susceptible to infestation by quarantine pests such as the rice stem nematode (“*Ditylenchus angustus*”), the larger grain borer (“*Prostephanus truncatus*”), and Johnson grass (“*Sorghum halepense*”). In accordance with the “Technical Requirements for Pest Risk Analysis of Import and Export Plants and Plant Products”(GB/T 20879-2007), a qualitative assessment was conducted regarding the risk level of rice infestation by harmful organisms. This assessment evaluated factors such as the likelihood of pest introduction and spread, as well as the potential severity of the resulting consequences; based on this analysis and utilizing a risk assessment matrix, the overall risk level for pest and disease outbreaks associated with rice was determined to be "High." Second, instances of non-compliant imported rice occur periodically. In 2022, nine batches were identified as non-compliant: seven due to quality deficiencies and two due to excessive heavy metal levels. In 2023, five non-compliant batches were detected, all of which involved quality deficiencies. In 2024, seven non-compliant batches were identified: four due to quality deficiencies, one due to a specific quality issue, and two due to packaging deficiencies.

Third, safety incidents have occurred within the realm of rice regulation. In 2013, the Guangdong Provincial Food Safety Committee announced that sampling inspections had revealed 126 batches of rice containing excessive levels of cadmium. In 2014, reporters from CCTV’s “News Investigation” program randomly purchased five bags of rice of different varieties; upon subsequent testing by the Chinese Academy of Inspection and Quarantine, the results indicated that three of these five rice varieties contained genetically modified (GM) ingredients.

3. Assessment Conclusions and Recommendations.

Based on a comprehensive assessment, imported rice carries a relatively high level of risk. Furthermore, current protocols governing rice exports to China require the exporting country's

competent authority to officially recommend rice processing enterprises that meet Chinese requirements to the Chinese authorities for registration. Therefore, it is recommended that the administrative requirements stipulated in Decree No. 248 be maintained, thereby continuing the practice of requiring official recommendation for the registration of overseas rice production enterprises. Given that the processing techniques and production capacities of rice production facilities remain relatively stable, they meet the criteria for applicability under Article 21 of the “Administrative Provisions on Registration of Overseas Manufacturers of Imported Foods”—specifically, the provision stating that “registration information may be automatically renewed in the absence of significant changes.” Consequently, it is recommended that the registration of rice production enterprises be automatically renewed.

(IX) Grain Milling Industrial Products and Malt

1. General Overview.

Grain milling products are powdered products processed from raw grains (including paddy rice, wheat, corn, soybeans, miscellaneous grains, etc.); these include wheat flour, corn flour, buckwheat flour, oat flour/flakes, rye flour, and others.² In recent years, the trade volume of grain milling industrial products and malt imported into China has seen a slowdown in growth. During the period from 2022 to 2024, 21 batches of imported grain milling industrial products and malt were identified as non-compliant, involving various issues such as excessive additive levels, excessive microbial levels, and non-compliance regarding quality or labeling. Currently, China implements quarantine access management for grain milling industrial products (specifically wheat flour and rye flour) and malt. This involves an officially recommended registration system, under which 695 overseas grain milling and malt production enterprises across 37 countries (regions) have obtained registration numbers for operation in China.

2. Product Risk Analysis.

First: Assessment of Processing Technology Risk Levels. Grain milling products are processed foods that undergo processing stages limited primarily to impurity removal and grinding. For instance, the processing technology for wheat flour mainly consists of: raw material reception and initial cleaning (screening, air classification, magnetic separation) — wheat surface cleaning (scouring/brushing, destoning, washing) — moisture adjustment and tempering — milling systems (breaking, purification) — and flour post-processing (blending, nutritional fortification, bleaching and maturation, air classification). The processing technology for malt mainly involves raw material cleaning, steeping, germination, drying, root removal, and final impurity removal/cleaning. According to Annex 2 of the “International Standards for Phytosanitary Measures: Categorization of Commodities Based on Pest Risk” (ISPM 32), the processing technologies for grain milling products (such as wheat flour) and malt fall under the category of processing methods where the commodity may still be susceptible to pest infestation after

² Grain and Oil Terminology: Grains, Oilseeds, and Their Processed Products GB/T 22515-2008

processing. Consequently, the risk level associated with the processing technologies for grain milling products and malt is assessed as "medium."

Second: Assessment of Pest and Disease Risk Levels. Pest and Disease Risks in Cereal Milling Products

Wheat flour and rye flour are classified as having a higher risk level, as they are susceptible to infestation by quarantine pests such as "Tilletia controversa" (dwarf bunt of wheat) and "Tilletia indica" Mitra (Indian bunt of wheat). The pest and disease risk levels for other cereal milling products are relatively lower. In accordance with the "Technical Requirements for Pest Risk Analysis of Import and Export Plants and Plant Products" (GB/T 20879-2007), a qualitative assessment was conducted regarding the risk of pest infestation in cereal milling products. This assessment evaluated factors such as the likelihood of pest introduction and spread, as well as the severity of potential consequences. Based on this assessment and utilizing a risk evaluation matrix, it was concluded that the pest and disease risk level for wheat flour and rye flour is "High," while the risk level for other cereal milling products (excluding wheat flour and rye flour) is "Low."

Malt is susceptible to infestation by quarantine pests such as "Tilletia controversa" (dwarf bunt of wheat) and "Tribolium destructor" (large black flour beetle). In accordance with the "Technical Requirements for Pest Risk Analysis of Import and Export Plants and Plant Products" (GB/T 20879-2007), a qualitative assessment was conducted regarding the risk of pest infestation in malt. This assessment evaluated factors such as the likelihood of pest introduction and spread, as well as the severity of potential consequences. Based on this assessment and utilizing a risk evaluation matrix, it was concluded that the pest and disease risk level for malt is "High."

Third: Non-compliance incidents involving imports over the past three years. In 2022, seven batches of grain milling products and malt were identified as non-compliant. Of these, two batches failed to obtain inspection and quarantine clearance, two batches exceeded permissible limits for food additives, one batch was contaminated with microorganisms, one batch had defective certification, and one batch had defective packaging. In 2023, six batches of grain milling products and malt were identified as non-compliant; specifically, two batches failed to obtain inspection and quarantine clearance, two batches were of substandard quality, and two batches had defective labeling. In 2024, eight batches of grain milling products and malt were identified as non-compliant, involving issues such as registration irregularities of overseas manufacturers (two batches), shelf-life specifications failing to meet national food safety standards (one batch), defective labeling (one batch), spoilage due to mold (one batch), discrepancies in certification (one batch), and failure to provide required certificates or proof of compliance (one batch). Based on the non-compliance trends observed over the past three years, the causes of non-compliance involve multiple risk factors—including microorganisms, food additives, and product quality. From the perspective of food safety regulation, it is therefore

necessary to continue implementing source-based oversight of overseas manufacturing enterprises.

Fourth, wheat flour has previously been implicated in food safety incidents. In 2020, “Consumer Reports” compiled quality sampling data for wheat flour released between February 2015 and February 2020 by national and provincial market supervision administrations (including the former Food and Drug Administrations), as well as market and quality supervision committees in select provinces and municipalities. The sampling data revealed that among 235 batches of wheat flour, non-compliance issues involved 14 specific parameters. These primarily included mycotoxins (deoxynivalenol, ochratoxin A, aflatoxin B1, and zearalenone), flour whitening agents (benzoyl peroxide and titanium dioxide), and residues of light or heavy metals (aluminum, cadmium, and lead). Notably, excessive levels of deoxynivalenol emerged as the most prominent issue regarding wheat flour non-compliance, detected a total of 180 times and accounting for 76.6% of all non-compliant cases. Deoxynivalenol—also known as “vomitoxin”—possesses potent cytotoxicity. Symptoms of acute poisoning typically manifest within 5 to 10 minutes of exposure, presenting as nausea, vomiting, abdominal pain, diarrhea, dizziness, and headaches. This issue has sparked widespread discussion online.

3. Assessment Conclusions and Recommendations

Based on a comprehensive assessment, imported grain milling products and malt are deemed to carry a relatively high risk. Furthermore, the protocols governing the export of wheat flour, rye flour, and malt to China require the exporting country's competent authority to recommend processing facilities that meet Chinese regulatory standards to the Chinese authorities for registration. Therefore, it is recommended that the administrative requirements stipulated in Decree No. 248 be maintained, thereby continuing the practice of requiring official recommendation for the registration of overseas production facilities for grain milling products and malt. Given that the processing techniques and production capacities for grain milling products and malt remain relatively stable, they satisfy the criteria for applicability outlined in Article 21 of the “Administrative Provisions on Registration of Overseas Manufacturers of Imported Food”—specifically, the provision stating that “registration information may be automatically renewed in the absence of any major changes.” Consequently, it is recommended that the registration for grain milling products and malt be automatically renewed.

(X) Dehydrated Vegetables

1. General Overview.

In 2024, both the variety and value of China's imports of primarily processed dehydrated vegetable products demonstrated an upward trend. Between 2022 and 2024, a total of 27 batches of dehydrated vegetables were identified as non-compliant; the primary issues involved excessive levels of pesticide residues, food additives, and contaminants. Currently, Customs implements an “official recommendation” registration system for overseas manufacturers of

imported dehydrated vegetables. To date, 193 overseas dehydrated vegetable manufacturers across 17 countries (or regions) have successfully obtained registration numbers for exporting to China.

2. Product Risk Analysis.

First, the products present a relatively high safety risk. Imported dehydrated vegetables consist primarily of dried konjac slices and konjac powder. These products are often produced using only basic processes—washing, slicing, and drying. Some manufacturers exhibit deficiencies in their hygiene control and standardized operational capabilities. Furthermore, the use of sulfur fumigation during processing frequently leads to excessive levels of food additives, such as sulfur dioxide; in 2024 alone, 26 batches were found to exceed permissible limits for food additives, and one batch exceeded the limit for the heavy metal lead.

Second, overseas manufacturers have failed to adequately fulfill their primary responsibilities regarding food safety. Most manufacturers of imported, primarily processed dehydrated vegetables operate as small-scale enterprises or family-run workshops. There exists a significant gap between the food safety awareness and professional competence of their employees and the actual requirements for food safety control. These manufacturers often lack sufficient understanding of China's current food safety laws, regulations, and national standards, and their food safety and hygiene management and protection systems are often inadequate. To improve product appearance or extend shelf life, some manufacturers illegally use bleaching agents, colorants, or preservatives that are prohibited in China, thereby directly shifting potential health risks onto domestic consumers and downstream food manufacturers.

3. Assessment Conclusion and Recommendations.

Based on a comprehensive assessment, the food safety risk associated with currently imported, primarily processed dehydrated vegetables is considered high. To strengthen source control and reinforce the accountability of both overseas regulatory authorities and manufacturers, it is recommended that the management requirements stipulated in Decree No. 248 be maintained, specifically by continuing to implement the "official recommendation" registration system for overseas manufacturers of dehydrated vegetables. The processing techniques and production capacity for dehydrated vegetables are relatively fixed. As this meets the applicable conditions set forth in Article 21 of the "Administrative Provisions on the Registration of Overseas Manufacturers of Imported Food"—specifically, that "registration information may be automatically renewed in the absence of significant changes"—it is recommended that the registration for dehydrated vegetables be automatically renewed.

(XI) Seasoning Powders

1. General Overview.

The primary types of imported plant-based seasoning powders include ground dill, ground pepper, mustard powder, curry powder, ground coriander, and others. From 2022 to 2024, a total of 10 batches of plant-based seasoning powders were identified as non-compliant. The main reasons for non-compliance were the presence of plant-derived ingredients that had not obtained inspection and quarantine clearance (6 batches), failure to provide required certificates or proof of conformity (3 batches), and non-compliant packaging (1 batch). Currently, Customs implements an official recommendation-based registration system for overseas manufacturers of imported plant-based seasoning powders; to date, 8,898 overseas dehydrated vegetable manufacturers across 31 countries (regions) have obtained registration numbers for exporting to China.

2. Product Risk Analysis.

First, the products present a relatively high safety risk. Plant-based seasoning powders are natural plant products—specifically the fruits, seeds, flowers, roots, stems, leaves, bark, or entire plants—that are ready for direct use and serve functions such as imparting aroma, enhancing fragrance, and flavoring. These products are manufactured through processing techniques such as natural sun-drying, roasting, and grinding. While processing methods like sun-drying, roasting, and grinding may eliminate or kill pests carried by the raw materials, certain processing stages remain susceptible to pest infestation.

Second, the quality and safety management standards of the manufacturing enterprises are relatively low. Most seasoning powders imported into China are minimally processed foods—either ground or simply cut into segments—and the manufacturing enterprises are predominantly small-scale, workshop-style operations. Consequently, the overall level of quality and safety management within the industry is relatively low. Situations involving cross-contamination during stages such as the open-air storage of raw materials, processing, and warehousing are highly prone to creating significant food safety risks.

Third, safety issues regarding seasoning powders occur periodically. For instance, India—a major source country for China's imports of plant-based seasoning powders—has faced issues regarding the detection of Ethylene Oxide (ETO) in its seasoning products. Since 2023, regulatory authorities in multiple countries have issued notifications regarding this issue, involving products from several of India's major manufacturers.

3. Assessment Conclusions and Recommendations. Based on a comprehensive assessment, most imported seasoning powders undergo only primary processing and therefore remain susceptible to infestation by harmful organisms. Furthermore, lax production controls at manufacturing facilities pose risks regarding substandard quality or the unauthorized use of food additives. To

strengthen source-level controls and reinforce the accountability of overseas regulatory authorities and manufacturers, it is recommended that the administrative requirements set forth in Decree No. 248 be maintained, specifically by continuing to mandate official recommendation as a prerequisite for the registration of overseas seasoning powder manufacturers. Given that the processing techniques and production capacities for seasoning powders are relatively stable, they meet the criteria stipulated in Article 21 of the “Administrative Provisions on Registration of Overseas Manufacturers of Imported Food”—which permits the automatic renewal of registration in the absence of significant changes to registration information. Accordingly, it is recommended that the registration for seasoning powders be automatically renewed.

(XII) Nuts and Seeds

1. General Overview.

"Dry nuts" is a collective term encompassing dried fruits as well as nuts and seeds. Dried fruits refer to products made from fresh fruit raw materials that have undergone dehydration processes, such as sun-drying or mechanical drying. Nuts and seeds refer to nuts, seeds, or kernels that have not undergone cooking processes; their processing typically involves drying, peeling, and shelling. China is a major importer and consumer of dry nuts; for certain categories—such as cashews, pistachios, and pecans—import dependency exceeds 90%. Dry nuts are generally consumed directly or after further processing by food manufacturers; given their broad consumer base within the country, food safety in this sector warrants significant attention.

Customs authorities implement market access management for dried fruits (excluding roasted or freeze-dried varieties) and nuts and seeds (excluding cooked, pickled, or roasted varieties). To date, 68 countries or regions have obtained market access for specific categories of dry nuts. Currently, Customs requires overseas production facilities for imported dry nuts to undergo official recommendation-based registration; 4,857 such facilities across 60 countries and regions have successfully obtained registration.

2. Product Risk Analysis.

First, the products present a high risk regarding food safety. In terms of raw materials, dry nuts are derived from plant fruits and seeds; consequently, issues such as the misuse of pesticides or soil contamination can compromise product safety. In terms of processing techniques—and in accordance with the International Plant Protection Convention (IPPC) standard “ISPM 32: Categorization of commodities according to their pest risk”—the processing of dry nuts is relatively simple, typically involving only basic physical treatments. As a result, these products remain susceptible to pest infestation, posing a risk of pest or disease transmission. Furthermore, driven by requirements regarding product appearance, quality, and preservation, manufacturers face the risk of using food additives in excess of permissible limits or outside of authorized scopes during production and processing. For instance, in recent years, dried apricots imported from Afghanistan and dried longans imported from Thailand have repeatedly been found to

contain sulfur dioxide levels exceeding regulatory limits. From the perspective of transportation and storage, dried nuts are primarily imported in bulk packaging; common packaging formats include woven bags or ton bags. If storage and transportation are mishandled, safety issues—such as pest infestation, microbial contamination, and quality degradation—may arise.

Secondly, the rate of non-compliance among imported dried nuts is high. Between 2022 and 2024, a total of 189 batches of dried nuts nationwide were denied entry. The primary reason for these rejections was substandard quality (including mold spoilage, excessive acid value, and elevated peroxide value), accounting for 101 batches—or 53%—of the total non-compliant shipments. This was followed by the detection of sulfur dioxide-based food additives exceeding regulatory limits, which accounted for 45 batches, or 24% of the non-compliant findings. These non-compliant findings indicate that certain overseas manufacturers still exhibit deficiencies in areas such as raw material control, production processing, and storage and transportation.

Thirdly, significant safety incidents have occurred within the dried nut sector. In 2018, a “Salmonella” outbreak occurred in Norway, resulting in 56 illnesses and 21 hospitalizations; investigations linked the outbreak to a specific mixed dried fruit product. In 2024, a food safety incident involving walnuts contaminated with “E. coli” O157:H7 occurred in the United States, affecting two states and resulting in 13 confirmed cases and 7 hospitalizations. In 2025, Canada confirmed 155 cases of “Salmonella” contamination, with investigations linking the outbreak to multiple batches of pistachios and pistachio-based products contaminated with “Salmonella”.

3. Assessment Conclusions and Recommendations.

Based on a comprehensive assessment, dried nuts present high risks regarding quarantine and sanitary safety. They require stringent controls over raw materials and production processes; furthermore, given their substantial import and consumption volumes, any safety issue that arises could have widespread repercussions. The frequent detection of non-compliant batches suggests that the awareness of primary corporate responsibility among relevant enterprises requires strengthening. To reinforce source-level control and ensure that overseas regulatory authorities and manufacturers fully discharge their responsibilities, it is recommended that the management requirements stipulated in Decree No. 248 be maintained, specifically by implementing an "official recommendation" requirement for the registration of overseas manufacturers of imported dried nuts. The processing techniques and production capacity for dried nuts are relatively fixed. As this meets the applicable conditions set forth in Article 21 of the “Administrative Provisions on Registration of Overseas Manufacturers of Imported Food”—specifically, that "registration information may be automatically renewed in the absence of significant changes"—it is recommended that the registration for dried nuts be automatically renewed.

(XIII) Dried Fruits

The risk assessment status remains as described above. For overseas production enterprises of imported dried fruits, a system of official recommendation for registration is implemented; such registration may be automatically renewed.

(XIV) Special Dietary Food

1. General Overview.

Special Dietary Food include foods for special medical purposes (hereinafter referred to as "FSMP"), foods for infants and young children (including infant and young child formula, complementary foods, etc.), nutritional supplements for pregnant and lactating women, sports nutrition foods, and others. China is a major consumer market for Special Dietary Food; notably, the market for FSMP is experiencing rapid growth. The scale of China's FSMP industry expanded approximately fourfold, rising from RMB 2.59 billion in 2016 to RMB 10.01 billion in 2021. By 2024, the market size had reached RMB 23.2 billion, and it is projected to grow to RMB 53.1 billion by 2029, representing a compound annual growth rate of 18.0%. As of November 2025, 1,464 overseas manufacturers of Special Dietary Food—hailing from 41 countries and regions—had obtained registration qualifications to operate in China.

China implements strict regulatory oversight over special foods, including foods for special medical purposes. Section 4 of the “Food Safety Law of the People's Republic of China” specifically addresses "special foods," explicitly stipulating that the State exercises strict supervision and administration over such products. The Law mandates that foods for special medical purposes must be registered with the food safety supervision and administration department under the State Council. During the registration process, applicants are required to submit documentation regarding the product formula, manufacturing process, labeling, instructions for use, as well as materials demonstrating the product's safety, nutritional adequacy, and clinical efficacy for its intended special medical purpose. Manufacturers of Special Dietary Food must organize their production operations in strict accordance with the technical requirements—including the registered product formula and manufacturing process—approved during registration. Enterprises engaged in the production of foods for special medical purposes, as well as other staple and complementary foods specifically intended for particular population groups, are required to establish a production quality management system commensurate with the foods they produce—in accordance with Good Manufacturing Practice (GMP) requirements—and ensure the effective operation of said system. Currently, both domestically produced and imported foods for special medical purposes are subject to registration with the State Administration for Market Regulation (SAMR) and must obtain a “Registration Certificate for Foods for Special Medical Purposes.”

2. Product Risk Analysis.

First, the consumer base for these products consists of vulnerable populations. The primary consumers of Special Dietary Food include infants and young children, pregnant women, and patients with rare diseases—a demographic characterized by its sensitivity and the high level of public attention it attracts. Special Dietary Food are products specifically processed or formulated to meet the unique dietary requirements associated with specific physical or physiological conditions, and/or with states involving diseases, disorders, or other medical conditions. The content of nutrients and/or other nutritional components in these foods differs significantly from that of comparable general-purpose foods. In particular, foods for special medical purposes are specifically processed and formulated to satisfy the unique nutritional or dietary needs of individuals facing restricted food intake, malabsorption or digestion disorders, metabolic disturbances, or specific disease states.

Secondly, the processing technologies involved are relatively complex. The manufacturing processes for infant and young child formulas encompass wet processing, dry processing, combined wet-and-dry processing, and liquid-phase processing. The production processes for foods for special medical purposes and other foods for special dietary uses typically involve a series of steps, including ingredient batching, weighing, heat treatment, intermediate storage, sterilization, drying, cooling, blending, and inner packaging (filling). The manufacturing processes for these product categories are comparatively intricate and involve numerous critical control points.

3. Assessment Conclusions and Recommendations

In summary, given the sensitive and specialized nature of the consumer base for Special Dietary Food—coupled with the increasingly stringent regulatory requirements for such products both domestically and internationally—it is recommended that the registration requirement for overseas manufacturers of Special Dietary Food continue to be designated as "officially recommended registration." This approach aims to continuously reinforce and consolidate the regulatory responsibilities of overseas authorities as well as the primary responsibilities of the enterprises themselves.

Furthermore, considering that a comprehensive regulatory framework is already in place for imported Special Dietary Food—including systems for formula registration, overseas manufacturer registration, and importer/exporter filing—and noting the specific regulatory mandates (such as the requirement that Chinese-language labels be printed directly onto the product's minimum sales packaging), the "whole-chain" regulatory measures currently in effect are generally rigorous. As no significant risks have been identified during supervisory sampling inspections or risk monitoring activities in recent years—indicating that the overall risk level remains controllable—and after balancing the imperatives of safety regulation with trade

facilitation, the expert assessment recommends that these products “not” be included in the "List of Foods Ineligible for Automatic Registration Renewal."

(XV) Functional Food

1. General Overview.

China implements strict regulation over special foods, including functional foods. Section 4 of the “Food Safety Law of the People's Republic of China” specifically addresses “special foods,” explicitly stating that the State exercises strict supervision and administration over such products. It stipulates that Functional Food being imported for the first time must undergo registration with the food safety supervision and administration department under the State Council; specifically, if such first-time imports are intended to supplement nutrients—such as vitamins or minerals—they must be filed with the food safety supervision and administration department under the State Council. Other Functional Food must be filed with the food safety supervision and administration departments of the people's governments at the provincial, autonomous region, or municipality directly under the Central Government levels. Currently, all Functional Food imported into China are required to obtain either a “Functional Food Registration Certificate (Import)” or a “Functional Food Filing Certificate (Import)”. For Functional Food manufactured on or after January 1, 2022, the Chinese-language label must be printed directly onto the product's minimum sales packaging.

2. Product Risk Analysis.

First, the consumer base for these products consists of sensitive populations. Functional Foods are defined as foods suitable for consumption by specific groups of people; they serve to regulate bodily functions, are not intended for the treatment of diseases, and pose no acute, sub-acute, or chronic hazards to the human body.

Second, the processing techniques involved are relatively complex. The manufacturing processes for Functional Food must be formulated in accordance with the specific characteristics of the product, as well as the relevant technical requirements for Functional Food registration or filing. These processes typically involve stages such as extract concentration, boiling, gelatin dissolution, fermentation, and extraction. Manufacturers must ensure that the active functional ingredients are neither lost, destroyed, nor chemically altered, and that no harmful intermediate substances are generated during production.

3. Assessment Conclusion and Recommendations.

In summary, given the specific and sensitive nature of the consumer base for Functional Food—and the correspondingly higher regulatory requirements for such products within China—it is recommended that the registration of overseas manufacturers of Functional Food continue to be designated as a category requiring "Official Recommended Registration." This approach ensures

the continued reinforcement and strict implementation of regulatory responsibilities on the part of overseas official authorities, as well as the primary responsibilities of the enterprises themselves.

However, given that comprehensive regulatory systems are already in place for imported Functional Food—including product registration/filing, overseas manufacturer registration, and importer/exporter filing—the overall regulatory framework covering the entire supply chain is robust. Consequently, the overall risk level is deemed controllable. After comprehensively balancing the imperatives of safety regulation with the facilitation of trade, the expert assessment concludes that Functional Food need not be included in the “List of Foods Ineligible for Automatic Registration Renewal”.

(XVI) Dairy Products

1. General Overview.

China is a major consumer of dairy products. As a staple in daily consumption, dairy products reach a broad demographic—particularly sensitive groups such as infants, young children, and the elderly—making their quality and safety directly linked to consumer health and social stability. As of November 2025, 2,265 overseas dairy production enterprises from 52 countries and regions have obtained registration qualifications to export to China. Internationally, implementing high standards and comprehensive, end-to-end regulatory oversight for dairy products is a widely accepted global practice.

2. Product Risk Analysis.

First, the consumer base is extensive and sensitive. Dairy consumption spans all age groups; specifically, products such as infant formula and nutritional supplements for the elderly cater to sensitive and specialized populations, attracting high levels of public attention. Consequently, should a safety issue arise, the repercussions are severe and the social impact is widespread.

Second, raw materials and finished products carry risks related to animal diseases and public health. Raw milk and certain dairy products may harbor zoonotic pathogens—such as those causing Foot-and-Mouth Disease or Brucellosis—posing potential risks for the transmission of animal diseases and compromising public health safety. Dairy raw materials originate from diverse sources—including cows, goats, and buffaloes—and the environmental conditions of their rearing facilities, as well as the efficacy of disease prevention and control measures, directly determine the safety and quality of the raw milk.

Third, processing techniques exert a critical influence on product safety. Dairy processing methods encompass pasteurization, ultra-high-temperature (UHT) sterilization, fermentation, and spray drying. During these processes, factors such as temperature control, time parameters, and equipment hygiene directly determine the effectiveness of pathogen inactivation. Inadequate

control during the processing stage can result in the survival of pathogenic bacteria—such as “Listeria” or “Salmonella”—thereby triggering food safety incidents.

Fourth, transportation and storage stages are susceptible to risk introduction. Most dairy products require storage and transport under refrigerated or frozen conditions; temperature fluctuations can lead to microbial proliferation, product spoilage, or the degradation of nutritional components. This is particularly critical for products with short shelf lives—such as liquid milk and yogurt—which demand exceptionally rigorous cold-chain logistics. Any lapse in control during transportation can very easily precipitate quality and safety issues.

3. Assessment Conclusions and Recommendations. In summary, dairy products present potential quarantine risks; moreover, their raw material sources, processing techniques, storage and transport conditions, and consumer base are all characterized by a heightened sensitivity regarding food safety. It is recommended that the registration of overseas dairy production facilities continue to be designated as a requirement for official recommendation, thereby consistently reinforcing and solidifying the regulatory responsibilities of overseas authorities as well as the primary safety responsibilities of the enterprises themselves.

Given that regulatory frameworks—such as formula registration, registration of overseas production facilities, and the filing of importers and exporters—are already in place for imported dairy products, the comprehensive, whole-chain regulatory measures currently in effect are generally rigorous, and the overall risk level remains controllable. Taking into account the need to balance safety oversight with trade facilitation, expert assessments suggest that dairy products need not be included in the "List of Food Products Ineligible for Automatic Registration Renewal."

(XVII) Aquatic Products

1. General Overview.

China is a major importer and consumer of aquatic products. A total of 87 countries of origin are involved in the trade of imported aquatic products. Aquatic products are consumed by a broad demographic and serve as a vital source of high-quality protein for residents; they are closely linked to the safeguarding of livelihoods and food safety. Consequently, the safety and quality status of imported aquatic products directly impacts public health, making their importance particularly pronounced.

2. Risk Analysis.

First, instances of non-compliance in imported food products occur periodically; therefore, reinforcing the regulatory responsibilities of official agencies in exporting countries is a necessary measure. In 2025, a total of 845 batches of aquatic products from 37 countries (or regions) were detected as ineligible for entry into China. The primary grounds for non-

compliance included: excessive levels or unauthorized use of food additives; discrepancies between goods and accompanying documentation; presence of aquatic animal diseases; failure to obtain inspection and quarantine market access approval; substandard quality; defective certification; excessive levels of contaminants; non-compliant labeling; presence of pesticide or veterinary drug residues; and microbiological or parasitic contamination. For certain countries, it remains to be verified whether the production conditions and hygiene control standards of enterprises exporting aquatic products to China fully meet Chinese requirements. To ensure the safety and reliability of aquatic products at their source, it is essential to further reinforce and strictly enforce the regulatory responsibilities of the competent official authorities in exporting countries.

Second, official recommendation for registration is a widely accepted international practice. In accordance with requirements such as EU Regulation 853/2004/EC and Regulation (EU) 2017/625 of the European Parliament and of the Council, the EU currently implements a system of official recommendation for the registration of enterprises exporting aquatic products to the EU from non-member states—including China. The entities subject to this registration primarily include: processing plants, cold storage facilities, processing vessels, freezer fishing vessels, and refrigerated transport vessels. Regarding aquatic products exported to Russia, exporting enterprises are required to apply for import sanitary registration with the Federal Service for Veterinary and Phytosanitary Surveillance of the Russian Federation. The United States imposes strict regulations on imported aquatic products; enterprises must register with the U.S. FDA or USDA and, in certain instances, are required to undergo on-site inspections. Japan requires enterprises exporting heat-processed products (such as canned goods) to register with the Ministry of Health, Labour and Welfare of Japan. Countries such as South Korea, Vietnam, Indonesia, the United Kingdom, and Brazil explicitly require that Chinese aquatic product export enterprises undergo a registration audit by their respective competent authorities, and that such registration be uniformly recommended by China's General Administration of Customs. Other nations—including New Zealand, Costa Rica, and Saudi Arabia—implement registration management systems for either specific categories of aquatic products or for all aquatic products.

3. Assessment Conclusions and Recommendations.

From the perspective of the products themselves, the risks associated with the inspection and quarantine of imported aquatic products are assessed as moderate. The current "official recommendation for registration application" mechanism serves as an effective means to control food safety risks at the source and to prevent the entry of non-compliant products. Furthermore, it encourages competent foreign authorities to fulfill their supervisory duties and prompts enterprises to uphold their primary responsibilities. Therefore, it is recommended that the registration system for overseas aquatic product production enterprises be maintained as an "official recommendation for registration" system.

From a global perspective, the processing technologies for aquatic products are generally relatively mature, and the processing procedures are straightforward. The registration information submitted by overseas aquatic product production enterprises consists primarily of static data—such as production qualifications and processing standards—and generally does not involve content requiring periodic updates. This aligns with the applicability criteria set forth in Article 21 of the “Provisions on the Administration of Registration of Overseas Manufacturers of Imported Food”, which stipulates that "registration information may be automatically renewed in the absence of significant changes." Provided that foreign competent authorities are strictly held accountable for their supervisory duties, and that enterprises are strictly held accountable for their primary responsibilities—and further, provided that the comprehensive regulatory framework for imported aquatic products (encompassing market access, registration, port inspections, and post-market verification) is rigorously implemented—it is recommended that overseas aquatic product production enterprises be included in the list of food categories eligible for automatic registration renewal.

In summary, it is recommended that the registration system for overseas aquatic product production enterprises be maintained as an "official recommendation for registration" system, and that such registration be eligible for automatic renewal.

(XVIII) Frozen Fruits

1. General Overview.

Frozen fruits refer to fruits—whether peeled or unpeeled, pitted or unpitted—that have undergone a rapid freezing process in compliance with the requirements of the “Codex Alimentarius” "Code of Hygienic Practice for Quick Frozen Foods" (CAC/RCP 8-1976), and which are maintained at a temperature of -18°C or lower (within permissible tolerances) at every point throughout the cold chain. China is a major importer and consumer of frozen fruits; the majority of imported frozen fruits are processed by food manufacturing enterprises prior to sale for consumption, while a portion is consumed directly. The domestic consumer base for these products is extensive. In 2024, national customs authorities oversaw and facilitated the importation of frozen fruits originating from 17 different countries and regions.

Currently, Customs does not subject frozen fruit products to market access management requirements. However, for imported frozen fruits covered by specific bilateral protocols, overseas production facilities are required to undergo official recommendation-based registration. For all other imported frozen fruits, overseas production facilities may apply for registration with Customs either directly or through an authorized agent. To date, 754 overseas production facilities across 28 countries and regions have successfully obtained registration.

2. Product Risk Analysis.

First, the food safety risk associated with these products is relatively low. In terms of raw materials and processing techniques, frozen fruits utilize fresh fruits as their primary input. The processing workflow typically involves washing, slicing/cutting, rapid freezing, weighing, and packaging; the washing stage helps to reduce pesticide and contaminant residues to a certain extent, while the rapid freezing process effectively eliminates hazards posed by harmful organisms. Regarding transportation and storage, the cold chain system serves to effectively safeguard product quality and extend shelf life. Frozen fruits are typically packaged in cartons; consequently, any spoilage or deterioration resulting from improper handling during transportation or storage is readily identifiable. From the perspective of the production facilities, enterprises manufacturing frozen fruits are required to possess specialized equipment and infrastructure—such as low-temperature processing environments and cold storage facilities—and generally operate on a large scale with relatively high standards of quality control.

Second, instances of non-compliance are infrequent. Over the past three years (2022–2024), a total of 24 batches of frozen fruits were denied entry into China nationwide. This represents a non-compliance rate of merely 0.1%, indicating an overall high level of product quality and safety.

Third, in accordance with prevailing international practices, official recommendation-based registration is not typically mandated for frozen fruit products. In accordance with the International Plant Protection Convention (IPPC) and the “International Standards for Phytosanitary Measures (ISPM) 32: Categorization of Commodities According to Their Pest Risk”, frozen fruits—having undergone a rapid-freezing process—present a very low pest risk; consequently, it is recommended that countries refrain from imposing restrictions on them. Major developed nations—such as Australia, the United States, and Japan—do not subject frozen fruits to official registration requirements.

3. Assessment Conclusions and Recommendations

Frozen fruit products present a low risk profile, instances of non-compliance are infrequent, and the quality control standards maintained by enterprises are relatively high. Furthermore, in line with international practices, these products are not typically subject to official registration requirements. Based on a comprehensive assessment, it is recommended that the registration process for overseas manufacturers of imported frozen fruits be transitioned to a system of independent enterprise registration with automatic renewal.

END UNOFFICIAL TRANSLATION

Attachments:

No Attachments.