



Voluntary Report - Voluntary - Public Distribution

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# **Report Name:** Registration and Export Processes for US Pet Food and Related Products to PRC China

Country: China - People's Republic of

Post: Beijing

**Report Category:** FAIRS Subject Report, Grain and Feed, Sanitary/Phytosanitary/Food Safety

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# **Report Highlights:**

The People's Republic of China (PRC) is an increasingly important market for the United States pet food and related products industry. Although import volumes of certain pet foods (such as dog and cat food) remained flat over the last several years, U.S. market share in this category has grown significantly. In 2022, PRC imports of U.S.-origin pet foods and related products reached record levels, and additional growth is anticipated. This report covers China's required registration and export processes for manufacturing facilities of U.S.-origin pet food ingredients, additives, and supplement products.

THIS REPORT CONTAINS ASSESSMENTS OF COMMODITY AND TRADE ISSUES MADE BY USDA STAFF AND NOT NECESSARILY STATEMENTS OF OFFICIAL U.S. GOVERNMENT POLICY

#### Background

Pet foods covered by this report are commercially processed, finished products including snacks, treats, and chews for companion animals such as dogs, cats, and other non-livestock species kept as household pets. This includes dry, canned, wet, and semi-moist products. Ingredients covered in this report include rendered poultry fat, porcine meal, lard, spray-dried porcine blood products, and porcine protein concentrate.

#### Process for Manufacturing Facilities to Export Pet Foods with Animal-Origin Ingredients or Pet Food Ingredients to the PRC from the United States

#### Step 1: Food and Drug Administration (FDA) Facility Registration

Pet food manufacturing facilities should be currently registered with the United States FDA. Please visit the <u>FDA website</u> for detailed information on facility registration.

#### Step 2: Animal and Plant Health Inspection Service (APHIS) Inspection and Approval

Manufacturing facilities in the United States must obtain inspection and approval of USDA APHIS Veterinary Services (VS) <u>before</u> exporting products and must maintain this approval annually. After inspection, APHIS VS issues the facility an approval number and shares it with APHIS in Beijing. In turn, the Beijing APHIS office transmits the facility's new approval number to the General Administration of Customs of China (GACC). After GACC reviews and updates its records, it issues the facility a GACC approval number. Note that any amendments to ingredient species must be approved by APHIS, submitted to GACC, and shown as updated on the GACC website <u>before</u> the facility may ship products. A failure to have this process completed before a shipment departs its origin point may result in clearance issues upon arrival in the PRC.

Please contact the relevant <u>USDA APHIS VS Center</u> for more information on inspection, approval, and ingredient amendment processes.

# **Step 3: Ministry of Agriculture and Rural Affairs (MARA) Product Import Registration License** (can be concurrent with Step 2)

Facilities must obtain a product import registration license from the MARA <u>prior</u> to shipping. The import registration license is valid for 5 years. A failure to obtain a MARA import registration license before a shipment departs its origin point may result in clearance issues upon arrival in China. **Note:** Some importers have had success shipping products through e-commerce without completing MARA registration, but exporters must work with their importers in China to understand if this is possible in their case.

Please review the FAS GAIN Report <u>CH15062</u> for more detailed information on the relevant PRC laws/regulations, standards, and feed ingredients and additives lists. This information is helpful for preparing applications for the import registration license with MARA. FAS China strongly encourages

exporters to employ a China-based office or experienced agent to ensure compliance with all regulations and complete the product licensing process with MARA.

#### Step 4: Confirm GACC Completion of Facility Listing

As mentioned in Step 2, APHIS will submit facility updates to GACC with APHIS approval numbers. APHIS typically submits updates monthly, and GACC is expected to update its website within 20 working days of receipt. GACC will grant a PRC approval number (formatted as NR-USA-XXX) to the facility and list the facility and product information on the GACC <u>Animal and Plant Quarantine</u> <u>Department website</u>.

Once GACC updates its website, APHIS will notify the facility. It is then the responsibility of the facility to confirm that its information is listed accurately on the GACC website. The importer or agent in China can assist in confirming this information.

### **Step 5: APHIS Export Certificate**

Before exporting products, facilities need to work with their APHIS Veterinary Service Center for the export certificate endorsement of the facility for each specific shipment. The certificate will indicate information such as facility name and address, product names, amount of shipment, buyer in China, the APHIS and China approval numbers, etc.

Please visit <u>APHIS' website</u> or contact <u>the relevant Veterinary Service Center</u> for more detailed requirements for APHIS' pet food certificates endorsement and exports requirements.

#### **Steps for Other Pet Food/Ingredient Products**

Manufacturing facilities exporting non-animal-based additives, premixes, supplements and compound animal feeds must contact <u>USDA-AMS</u> rather than APHIS to obtain GACC facility listing information after obtaining FDA facility registration (step 1) and MARA product registration (step 3). To obtain export certificates such as Certificate of Free Sale (COFS) and Certificate of Exportability (COE), please visit the FDA Center for Veterinary Medicine (CVM) <u>Export Certification Application & Tracking system</u> (CVM eCATS).

#### Additional Steps for Aquatic Product-Based Pet Food/Ingredient Products

For exporting fishmeal, fish oil, or other exclusively-fish-based protein commodities intended to use for pet foods, please contact <u>NOAA's National Marine Fisheries Service (NMFS)</u>.

# Labeling Requirements

Manufacturers/exporters are responsible for ensuring pet foods meet China's relevant domestic regulations on safety, hygiene, and labeling (please refer to FAS GAIN report <u>CH15062</u> and the <u>MARA</u> <u>website</u> for more detailed information).

PRC labeling regulations provide detailed requirements for pet food labeling, which must include the product name, raw materials, product component analysis guaranteed value, net weight, storage conditions, instructions for use, cautions, production date, shelf life, name and address of the manufacturer, country of origin, and licensing certificate number. The labeling regulation has strict requirements for claims about pet food, including claims about ingredients, special features, and functions.

Please refer to the MARA website for the most recent pet food labeling regulations.

#### **Additional Information**

Manufacturers/exporters should work with their importers in China to arrange export document preparation such as certificates of origin, customs declaration materials, and contract and billing information.

For the protection and enforcement of intellectual property in China, please visit the U.S. Patent and Trademark Office website for the <u>China IPR Toolkit</u>, which provides comprehensive information on intellectual property guidance including China's current intellectual property system, application of trademarks, a step-to-step guide on how to register a patent, and tips for protecting copyrights in China.

Please see FAS GAIN report (<u>CH2022-0060</u>, <u>CH2023-0019</u> and <u>CH2020-0097</u>) for more market and trade information, and cross border e-commerce processes.

**Note:** China permits the inclusion of animal-origin ingredients derived from poultry, livestock (swine and ruminants), farmed terrestrial animals, aquatic animals (farmed or wild-caught) and bees. Ingredients derived from wild terrestrial animals, reptiles, amphibians, and insects other than bees are prohibited. All U.S.-origin bovine (cattle and bison) ingredients authorized for domestic pet food production are allowed. Imported ingredients are allowed except for certain ruminant materials. Sheep/lamb and goat ingredients must be of Australian/New Zealand origin. Bovine dairy, bovine gelatin, bovine collagen, and bovine tallow with maximum level of insoluble impurities of 0.15 percent by weight may be legally imported from any country. All other bovine materials must be legally imported from one or more of the following countries: Argentina, Australia, Chile, Colombia, Costa Rica, Mexico, New Zealand, Nicaragua, Panama, Paraguay, Peru, and/or Uruguay.

FAS China publishes an annual Food and Agricultural Import Regulations and Standards Country Report (Most recently: GAIN Report <u>CH2022-0038</u>) and an annual Export Certificate Report (GAIN Report <u>CH2022-0043</u>). These reports include regulations and standards applicable to pet food imports, registration requirements, and export certificates for pet food exports to China.

#### **Attachments:**

No Attachments.