

## Chinese Labeling Regulation

China labeling regulations have a significant impact on U.S. exporters of packaged foods. U.S. traders interested in exporting products to China should have a clear understanding of these regulations. In the past, the China labeling application was very complex and had many strict requirements. However, recently the Chinese government issued a new proclamation; the **“Proclamation about Adjustments to the Approval System for Labeling of Imported Food and Cosmetic Products”**. The new regulation took effect April 1st, 2006. It states that labeling for import products will no longer require pre-inspection or pre-approval.

As of April 1<sup>st</sup>, 2006, label approval and inspection and quarantine for imported food and cosmetics were combined, and will now be carried out at the same time, upon the product’s arrival. As mentioned above, there is no longer any pre-inspection or pre-approval. Different levels of government agencies will no longer receive applications for imported food and cosmetic product label pre-approval. Chinese labels can be prepared before exportation and submitted to the relative government agencies when the products arrive. The Entry–Exit Inspection and Quarantine Bureau will now check whether the label

content complies with applicable laws and regulations, and whether the content related to quantity is correct and accurate when going through inspection and quarantine procedures.

In cases where the exporter received a “Certificate of Imported and Exported Foods and Cosmetics Inspection” before April 1<sup>st</sup>, the certificate will still be valid as long as the product label content is in accordance with the content stated on the certificate. If all is seen to be in accordance, the product will be free from labeling inspection. If not in accordance the certificate is invalid as the dead line for re-issuing was May 1, 2006.

The Inspection and Quarantine Organization will carry out inspection and quarantine for imported and exported food and cosmetics, including label approval, inspection and examination. Expenses should be charged according to the charge standard issued by the organization. No other labeling approval fees will be charged.

## **Requirements of Chinese Labeling**

Chinese labels should be made in accordance with the “General Standard for Labeling of Pre-Packaged Foods for Special Dietary Use” And The “General Standard for the Labeling of Pre-Packaged Foods” issued by China’s Quality Supervision, Inspection and Quarantine Authority and the National Standardization Administration Committee. All packaged food products (except bulk) sold in China must have labels in Chinese stating all of the following information:

- Trademark
- Food name
- List of ingredients
- Net content
- Name and address of manufacturer and distributor

- Indication of production and expiry date
- Country of origin

All content must be in Chinese characters, except for the trademarks. The Chinese characters, symbols and numbers on mandatory labels cannot be smaller than 1.8 mm (0.07 inch) when the surface area of the packing material or container is greater than 20 cm<sup>2</sup>. Pinyin or foreign languages may also be used corresponding to the Chinese characters (except the name and address of the manufacturer of the imported food and the overseas distributor), but cannot be larger than the Chinese characters.

Imported packaged foods must have a Chinese label when imported to China. Those labels that do not meet Chinese labeling laws and regulations will be refused entry.

English-language versions of the new regulations and other rules about food additives such as food laws, labeling requirements, food additives regulations, organic "green" food standards, copyright/trademarks, and pesticides and other contaminants can be obtained from the **China Food & Agricultural Import Regulations & Standards Report (or China FAIRS Report)**. The translations available are listed in the FAIRS Working Index, which is posted on the FAS website ([www.fas.usda.gov](http://www.fas.usda.gov))

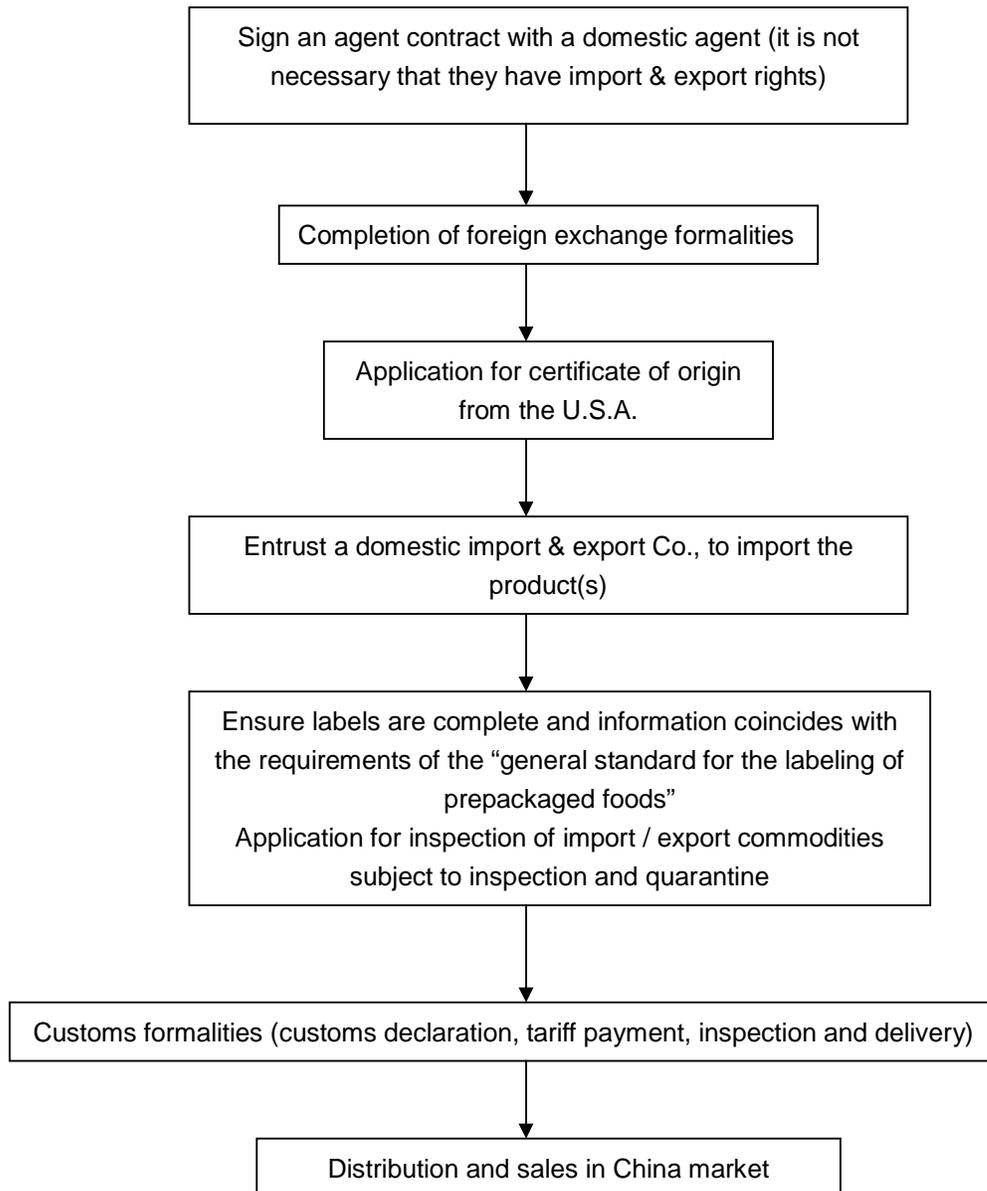
***The basic food labeling requirements for all pre-packaged products are:***

Requirement	Description
Food name	<ul style="list-style-type: none"> <li>· The common or usual name must be used for a food if it has one. It would be considered misleading to label a food that has an established name with a new name. If the food is subject to a standard of identity it must bear the name specified in the standard.</li> <li>· The name of food labels must be printed in standard (simplified) Chinese characters, with a minimum type height of 1.8 mm (0.07 inch). The Chinese characters must at least be as large as the corresponding text of any other languages (including Chinese Pinyin - Latinized phonetic spelling) printed on the label.</li> </ul>
Net content	<ul style="list-style-type: none"> <li>· The net content declaration shall be expressed using net content, numerals and the official unit of measurement, for example: ounces, pounds, fluid ounces, pints and/or quarts etc</li> <li>· The format: For solid foods, by weight is g or kg</li> <li>· The net weight statement must have the words Net Weight, or Net Wt. for food products sold by weight. The terms Fl. oz., Net__ fl. oz. or Net Contents__ fl. oz. must be used for products sold by liquid measure.</li> <li>· It is highly recommended that a metric equivalent be included in parentheses with the net weight statement. EXAMPLES: Net Wt. 1 lb. (454 g.) or 1 pt. (473 ml) or Net 1 fl. oz. (29.5 ml).</li> </ul>

<p>Name and address of the manufacturer and distributor</p>	<ul style="list-style-type: none"> <li>· The name and address (including street address, city, state, and zip code) of any legally registered entity responsible for food manufacturing, packaging, or distribution must be indicated accordingly.</li> <li>· Names and addresses of group companies and its subsidiaries that undertake independent legal liabilities must be indicated respectively.</li> <li>· In cases where an entrusted company processes pre-packaged food for its client but does not undertake marketing, the name and address of the the entrusted company must be indicated.</li> <li>· Post office boxes cannot be substituted for physical addresses.</li> <li>· For imported prepackaged food, the country or region of origin (including Hong Kong, Macao or Taiwan) and the name and address of the agent, importer or distributor registered in the P.R. China, must be declared.</li> </ul>
<p>List of ingredients</p>	<ul style="list-style-type: none"> <li>· Pre-packaged food labels, except for single-ingredient food, must contain a list of ingredients.</li> <li>· All ingredients should be listed in decreasing order based on the quantity level in the course of food manufacturing or processing. Ingredient quantity of no more than 2% may not necessarily be listed in descending order.</li> <li>· If a compound ingredient consists of two or more other ingredients, the name of the compound ingredient should be identified in the “ingredient list” followed by information in parentheses that lists the original ingredients in descending order based on quantity levels. For example Ingredients such as baking powder, salsa, soy sauce, prepared or mustard must have a breakdown of its primary ingredients. Soya sauce, for example, would be listed as “soy sauce (water, wheat, soy beans, salt, spices)”. After the parentheses one would continue on with the remaining ingredients. Where a compound ingredient constitutes for less than 25% of the food its primary ingredients need not be declared.</li> <li>· Sweeteners, preservatives and colorings must be identified with specific names. Other food additives may be indicated with specific names or category names.</li> </ul>

<p>Date marking</p>	<ul style="list-style-type: none"> <li>· The date of manufacture (or the date of packaging) and the shelf life should be clearly marked.</li> <li>· Self life should adopt the following forms: <ul style="list-style-type: none"> <li>■ “Recommended to drink before...”, “Best Before...” Date of minimum durability ends on...”, “Date of minimum durability is xx months (xx days, xx years), “Expiry date...”.</li> <li>■ If the shelf life is associated with storage conditions, the particular storage conditions for the food should be indicated.</li> </ul> </li> </ul>
<p>Nutritional facts Table</p>	<ul style="list-style-type: none"> <li>· For those general food items and special meals which satisfy the requisite conditions under the new rules are also allowed to specify on their labels the level of nutritional value, nutrition content, nutrient functions, comparative and reference data about the nutrient/s. For instance low calories, low fat, low (no) cholesterol, sugar free, high calcium, and such health and nutritional knowledge as “calcium is a principal constituent of bones and teeth” etc.</li> <li>· The following label information is prohibited: <ul style="list-style-type: none"> <li>■ Any claims as to the prevention, alleviation, treatment or cure of a disease.</li> <li>■ claims such as “rejuvenating function”, “promising longevity”, “reverting white hair to dark”, “regenerating a lost tooth”, “preventing and curing cancer” or other equivalents.</li> <li>■ The use of a drug’s name immediately before or after the name of a food, or the use of pictures and the name of a drug together implying specific treatment and/or functional effects of such food (does not apply to substances which can be used both as a drug and food).</li> </ul> </li> </ul>

## ***Import Procedure***



## Government Agency

### *China Government Agencies*

There are a number of government acts and regulations that govern the importation of food into China.

Government Regulatory Organizations	Function	Information
State General Administration of the People's Republic of China for Quality Supervision and Inspection and Quarantine (AQSIQ)	Government of China's regulator for product quality.	<a href="http://www.aqsic.gov.cn">www.aqsic.gov.cn</a>
China Association for Standardization (CAS)	CAS consists of organizations and individuals engaged in nation wide standardization based on voluntary participation. It is a public society of standardization with legal status approved by AQSIQ.	<a href="http://www.china-cas.com">www.china-cas.com</a>
Institute of China Standard (CNIS)	CNIS is a national research body for social benefits, directly subordinated to AQSIQ. The establishment of CNIS is to promote standardization in relevant research and development and management of standards in order to meet the demands of a socialist economic market construction.	<a href="http://www.cnis.gov.cn">www.cnis.gov.cn</a>
Standards Press of China (SPC)	The Standards Press of China (SPC) is the only publication center in China for publishing national standards, professional standards, standard compilation books, scientific and technical books, and other books concerned with standardization, quality control and quality supervision.	

China Customs	Its mission is to promote compliance with China's tax, trade, border legislation and regulations	<a href="http://www.customs.gov.cn">www.customs.gov.cn</a>
China Quality Certification Center (CQC)	CQC is appointed to undertake the work of compulsory product certification for 17 categories within the CQC catalogue	<a href="http://www.cqc.com.cn">www.cqc.com.cn</a>
China Council for the Promotion of International Trade (CCPIT)	CCPIT comprises VIPS, enterprises and organizations representing the economic and trade sectors in China. It is the most important and the largest institution for the promotion of foreign trade in China.	<a href="http://www.ccpit.org/servlet/org.servlet.en.OrgWebEn?actionType=Home&amp;OrgId=1">www.ccpit.org/servlet/org.servlet.en.OrgWebEn?actionType=Home&amp;OrgId=1</a>
China Entry-exit Inspection and Quarantine Bureau (CIQ)	Established to certify the quality of commodities.	<a href="http://www.shciq.gov.cn">http://www.shciq.gov.cn</a>