Obligation Checklist for Exporting Infant Formula to China

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Precondition: Manufacturer Approved by China

The infant formula exported to China should be made by manufacturers which are approved by China CNCA. Updated till 31 Jul 2014, a total of 53 foreign infant formula manufacturers have got CNCA's approval (List of China CNCA-Approved Overseas Infant Formula Manufacturers).

From May 1st deadline, only infant formula made by those registered manufacturers can be exported to China and the label of each product will bear the manufacturer's Approval Number. Later, AQSIQ published the list of importers and brands of imported infant formula in China.

Background information:

China AQSIQ implements the Administrative Measures on Inspection, Quarantine and Supervision of Import and Export Dairy Products (AQSIQ Order No.152-2013) from 1 May 2013. The new regulation requires overseas dairy manufacturers (including infant formula) to follow requirements in the Administrative Provisions on Registration of Overseas Manufacturers of Imported Foods (AQSIQ Order No. 145-2012) to finish registration with AQSIQ before 1 May 2014.

China CNCA is the authority entrusted by AQSIQ to be responsible for the registration issue. An Infant Formula Manufacturer who wants to do registration must be recommended by the dairy competent authority in his country to CNCA first and fills out an application form and submits to the authority. Site visit of the factory will be conducted by experts organized by CNCA whenever necessary.

Figure. Basic Steps for Registration of Overseas Infant Formula Manufacturers
On 1 Oct 2012, AQSIQ implemented the Administrative Provisions on Filing of Importers and Exporters of Imported Foods (AQSIQ Order No.55-2012). Exporters of foods (including dairy products) should file required information with AQSIQ.

Q1: where can I do the filing?
A1. On 28 Sep 2012, AQSIQ announced to lunch the online filing management system http://ire.eciq.cn for food exporters and importers to do filing on line. Foreign exporters can click the “Login” button and then click “Initial Registration” button” to enter the initial filing page and fill out all information required: 
Click here to download the bilingual user manual of the online filing management system.
Important note:
Upon submitting the application, the system will generate a filing number and a query number, which is your account used to access the system again to check the progress of the application or modify any information as necessary. Please keep a record of the two numbers.

Q2: How long will it take to get filed?
A2. After information submission, AQSIQ official will complete the review within five working days.

Label Compliance with relevant Chinese national standards

Imported infant formula must have Chinese labels, which should be designed in line with requirements in the following two standards:

- **GB 7718-2011 General Standard for the Labeling of Prepackaged Foods** [预包装食品标签通则]
- **GB 28050-2011 General Standard for the Nutrition Labeling of Prepackaged Foods** [预包装食品营养标签通则]
- **GB 10765-2010 National Food Safety Standard Infant Formula** [婴儿配方食品]
- **GB 10767-2010 National Food Safety Standard Older Infants and Young Children Formula** [较大婴儿和幼儿配方食品]

From 1 April 2014, baby formula exported to China must have the Chinese labels printed on the cans, boxes, or bags for retail before entry of the country, according to AQSIQ Announcement No. 133-2013. Any discrepancies and non-compliances will trigger direct reject or destroy by local CIQ inspection officials. To reduce the potential risks, it is highly recommended for exporters to ask a Chinese food regulatory expert to preview labels before printing on cans. Food experts from REACH24H receive professional infant formula labeling training provided by CIQ officials. If you need such kind of service, please feel free to contact echo@chemlinked.com for further information.

Label Filing with local CIQ

Label filing is one of steps during CIQ inspection and customs clearance. The label of all prepackaged foods exported to China (including infant formula) should be filed with local CIQ when first import. Labels pasted or printed on packages should be identical to the labels filed with local CIQ. For second import, CIQ official will not thoroughly check the label again.
because they already have record of this label. Please note for infant formula, only the goods arrive at port can the importer or the third party (like REACH24H) can do the label filing. The original label, translation of the original label and Chinese label are needed for labeling filing.

**Testing Report**

For first import of infant formula, consignee should submit testing report for CIQ inspection and customs clearance. The overseas companies are encouraged to conduct tests in Chinese official labs for two reasons:
Ø Test methods adopted by Chinese accredited food labs and other countries are different, so the testing results may be different;
Ø Testing reports issued by Chinese accredited food labs are more easily to be accepted by CIQ inspectors.
REACH24H would like to be your testing agent to assist you to arrange the testing of your infant formula products if you want your products to be tested in China.

**Compliance Advice**

In term of such strict regulatory requirements for imported infant formula, to minimize potential risks of the reject/destroy of goods, REACH24H recommends that overseas exporters can export a small amount by air shipment for testing or trial export, which then will be subject to full compliance check. If everything goes well, the remainder of the same batch can go in full container.