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Cross-border first: why European skincare brands should skip NMPA registration in year one

For a European skincare brand with no sales history in China, local trade either offline or online asks for the most money and the most disclosure at the moment you know the least. Cross-border e-commerce lets you sell legally to Chinese consumers first, and decide later.

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Two doors into the same market

Imported cosmetics reach Chinese consumers through two legally distinct channels. Under general trade, a product must be filed or registered with China's National Medical Products Administration (NMPA) before it is sold: a filing for general cosmetics, a full registration for "speciality" cosmetics such as hair dyes, sunscreens and whitening products [1]. The screening dossier discloses the ingredient names and the entire formula [2].

Under cross-border e-commerce (CBEC), the same product is sold to a Chinese consumer through an approved online platform and cleared as an import for personal use. CBEC retail imports on the official list are exempted from import licenses and from registration or screening [3][2]. They do not need labeling in Chinese either [4].

The word "skip" in our title may be provocative but it applies to the first year, not forever. The point is to put the two *market-entry* doors in the right order.

What general trade asks of you up front

Since 1st May 2025, any registrant must submit a full-version product safety assessment report, covering among others stability, preservative challenge testing and packaging compatibility [5]. Imported general cosmetics can avoid the local mandatory animal testing, but only if the manufacturer holds a GMP (Good Manufacturing Practice) certificate issued by an accredited government authority in the country of origin and where the safety assessment fully confirms product safety [6]. In the past, only few overseas regulators issued such certificates, which limited the practical reach of the exemption [7]. In France the certificate is issued by ANSM, but it is the factory that must apply, which is not always straightforward for

a brand using a contract manufacturer. Speciality cosmetics, baby and children's products and those using new ingredients still in their monitoring period remain subject to toxicological testing [2].

None of this is unreasonable for a brand that already knows its range of China best-sellers. It is expensive for a brand that does not. Each filing fixes a formula, a product name and a set of claims for a cost and before the Chinese market has said which products it wants.

What CBEC gives you instead

Three things matter in a first year.

- **Speed.** A product can go live once the online platform and its customs broker have onboarded it, with no pre-market dossier.
- **Tax.** Within the transaction limits, CBEC goods pay no import tariff, and VAT and consumption tax are levied at 70% of the statutory amount only. For cosmetics, the combined rate is 9.1% for ordinary products and about 23% for "high-end" products, hereby defined by an import price above RMB 10 per ml or gram, or RMB 15 per piece [8].
- **Data.** Every order is a named consumer purchase on a platform such as Tmall Global, JD Worldwide or Douyin's cross-border channel. You learn which SKUs, price points and claims convert into effective sales.

Products can stand in a bonded warehouse inside a CBEC pilot zone for faster delivery, or be shipped direct from abroad, or from a stock held in Hong Kong thanks to the city's efficient import process. In 2021 the pilot scheme was extended to every city with a pilot free trade zone, comprehensive bonded zone or bonded logistics centre [9].

Selling cross-border does not mean selling without obligations. The rules assign responsibilities to each party: the overseas brand as the CBEC enterprise, the platform, domestic service providers such as customs brokers, and the consumer [9]. In practice the brand remains accountable for product quality, consumer complaints and recalls, and needs a local partner in China able to handle them.

The limits you accept

CBEC is a consumer channel, not a distribution model. Each consumer is capped at RMB 5,000 per transaction and RMB 26,000 per year. To avoid unsolicited local trade, any good bought this way may not be resold in Mainland China [3]. That rules out beauty counters, spas, hotels and any B2B partner that needs local stock. Offline sampling and in-store events need general-trade goods.

The tax advantage also rests on the local policy, which has been revised several times since 2016. A brand whose entire China business sits in CBEC carries all policy risk alone.

Finally, cross-border prices are visible to your customers. But to competing channels too. A Chinese consumer compares your Tmall Global price with your Hong Kong counter, your own

website and the "daigou" reseller (grey-market dealers) on social media. Set a price corridor before launch, or the cheapest channel will set it for you.

When to move to general trade

We recommend building the NMPA dossier while selling cross-border, and filing when at least one of three conditions is met:

- An offline partner (department store, distributor, salon chain) is ready to commit to stock.
- Your best-selling SKUs are stable enough that you would not change their formula or claims in the next two years.
- Volumes are high enough for the numbers to cover the fees of a local responsible person and the filing costs — not optimism.

At that point you file only the products the market has already chosen. The rest of the range can stay cross-border and be introduced later step by step.

Building a range that can graduate

These choices decided in year one will eventually make the later move easier. First, avoid launching with claims that would turn a product into a speciality cosmetic under general trade, unless they are central to the brand: a whitening serum that sells well cross-border would require a full registration file later. Second, gather the documents needed in the full safety assessment as soon as possible, and especially as your formulator and raw-material suppliers are still engaged: ingredient safety data, stability and challenge tests, packaging compatibility [5].

> **THE FIRST EDIT ASIA VIEW**
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> *For a brand with around a dozen hero SKUs and no offline partner in sight, cross-border first is almost always the better order. It turns China from a regulatory project into a commercial test. The mistake is to treat CBEC as the destination. Run it as a twelve-month experiment with a defined exit into general trade, and file only the products that have earned their place.*

Sources

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