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GACC Decree 280: registering your overseas food facility before your first container ships

For a European fine-food producer, the first gate into China is not the label or the importer. It is the factory's GACC registration number. Since 1st June 2026 that number is governed by new rules, and a shipment declared without it cannot clear customs.

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From Decree 248 to Decree 280

China's General Administration of Customs (GACC) published Decree 280 on 14th October 2025 [1]. It took effect on 1st June 2026, replacing Decree 248, which had governed the registration of overseas food manufacturers since 2021 [2]. The implementing details, including product lists and declaration rules, followed in GACC Announcement No. 27 of 18th March 2026 [3].

Valid Decree 248 registrations carry over until they expire and do not need a new application [3]. What has changed is how to register, how renewal works and what the customs declaration must contain.

Who has to register

Decree 280 covers overseas enterprises that produce, process or store food exported to China as cargo, whether for human consumption or as an ingredient. Food additives and packaging fall outside its scope. Cold stores holding land-animal products or seafood before export are now in scope [3].

That last point matters for foreign exporters who consolidate shipments. A logistics hub that holds cured meats or seafood in cold storage before they leave for China now needs its own registration, in addition to the producers [3].

Cross-border e-commerce retail imports are currently exempt, because they are treated as personal-use imports rather than cargo. That treatment has been under discussion and could change [3].

Three pathways

1. **Official list.** Seventeen higher-risk categories need a hygiene inspection and a recommendation letter from the exporting country's competent authority. They include meat, dairy, edible oils and fats, bee products, stuffed pasta, nuts and seeds, dried fruits, seasoning powders, health supplement foods and aquatic products. The main change: the company now submits its application to GACC directly once it holds the authority's inspection report and recommendation, whereas under Decree 248 the authority had to submit it by itself [3].
2. **Self-application.** Every other category applies directly through GACC's online system, CIFER [4], with the completed application form, identity documents such as a business registration, and a compliance declaration [3]. For foreign producers this usually covers products such as confectionery, biscuits or beverages, provided their category is not on the official list.
3. **List registration.** New under Decree 280, it allows the competent authority of a country whose food safety system GACC has formally recognised to submit a batch list of enterprises. Availability depends on bilateral arrangements and should be checked with your national authority [3].

GACC charges no fee for registration [5].

Renewal: automatic, with exceptions

Registrations last five years and now renew automatically in most cases. Meat products and edible bird's nests — a Chinese delicacy — are excluded and must apply for renewal between three and twelve months before expiry [3][2]. Automatic renewal also stops if the enterprise is in a rectification period, if imports of that category from its country are suspended, or if its registration has been suspended, revoked or cancelled [3]. Decree 280 also widens the grounds for revocation from seven to nine [5].

The customs declaration

This is where shipments fail. Since 1st June 2026, every covered import declaration must carry the overseas producer's registration number under license category code 519, consistent with the declared country of origin, and the purpose field must read 食用 (for human consumption). If either entry is missing or wrong, the declaration is rejected [3].

Timing matters too. Under the official list pathway, goods produced while the registration was valid can still be declared after it expires, within their shelf life. Under self-application, the registration must be valid on the day of declaration [3].

Six steps before the first container

— **Classify** each product in CIFER by HS and inspection code, and confirm which pathway applies;

- **Register the actual producer.** The number declared must be that of the producer of the specific goods [3]. A brand using a contract manufacturer needs that manufacturer's registration, site by site;
- **Check origin consistency.** The registration number must match the declared country of origin [3]. A product made in Italy and packed in France must be declared, and registered, consistently with where it is legally produced;
- **Start early with your authority** if your category stands in the official list. Its inspection sets your calendar;
- **Brief the importer's customs broker** on code 519 and the 食用 field, and test a declaration before the goods leave Europe;
- **Track the expiry date** and check status in CIFER, especially for meat-based products;

Registration is necessary, but not sufficient. Chinese labelling, the importer's own obligations and product standards remain separate gates.

Beware the shortcuts

GACC has warned exporters against fraudulent websites imitating its registration system [3]. The official platform is CIFER [4]. Any payment requested for the registration itself, as opposed to a consultant's fee, is a warning sign.

> **THE FIRST EDIT ASIA VIEW**
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> *Decree 280 makes China slightly easier for low-risk categories and stricter at the border for everyone. For an overseas producer, the decisive work happens upstream: know which site makes each product, register that site under the right pathway, and make sure the importer's broker declares it correctly. Cross-border e-commerce remains the best way to test demand without registration, but plan it as a test, not as the permanent answer.*

Sources

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