

Voluntary Report – Voluntary - Public Distribution

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Report Highlights:

The General Administration of Customs of China (GACC) requires enterprises be registered with the Bureau of Import and Export Food Safety before exporting most food and beverage products as part of the requirements enumerated in Decree 248. U.S. enterprises registered in the China Import Food Enterprises Registration (CIFER) system as part of the country's requirements should take notice of their registration expiration date at the CIFER Query website. GACC requests that enterprises submit the necessary documents to prevent any registration status lapse. U.S. enterprises must initiate the registration renewal process within the window of three to six months prior to the registration's expiration date. For enterprises registered via U.S. FDA, (i.e., enterprises subject to competent authority registration), there is a separate obligation to renew your listing application within the FDA Export Listing Module (ELM) every two years.

FAS China provides this analysis and reporting as a service to the United States agricultural community, and to our farmers, ranchers, rural communities, and agribusiness operations in support of a worldwide agricultural information system and a level playing field for U.S. agriculture.

NOTE: The following text does not apply to U.S. exporters of meat, poultry, dairy, and seafood products. Exporters of those products should continue following procedures for exporting to China as outlined by relevant U.S. food safety regulators: [FSIS](#) and [FDA](#).

U.S. enterprises registered in the China Import Food Enterprises Registration (CIFER) system should note their registration expiration date via the CIFER Query website (<https://ciferquery.singlewindow.cn/cfppwebserver/static/pages/cifer/common/html/productSearch.html>) and ensure that they submit the necessary documents on time to prevent any lapse in their registration status. Generally, an enterprise registration in CIFER is valid for 5 years from the date of registration approval but this registration validity period may be made longer or shorter at the discretion of Chinese authorities. In many instances, GACC did not grant five-year initial CIFER registrations based on their internal policies. Facilities should be aware of their registration expiration date and make plans for how and when they will complete their registration renewal applications.

There is a strict renewal window that U.S. enterprises must follow to renew their CIFER registrations. U.S. enterprises must initiate the registration renewal process within the window of three to six months prior to the registration's expiration date. After this point, U.S. enterprises will not be able to renew their registration. Once the renewal window closes, U.S. enterprises will need to submit a new application for registration if they would like to export products to China. This process can be very lengthy and may cause serious delays. Upon approval, the General Administration of Customs of China (GACC) will extend the registration validity by 5 years.

Six months before the registration expires, a system pop-up in CIFER will remind enterprises to submit their extension application but no other notice will be provided. The reminder includes the registration number, current validity date, and the deadline for the extension application. U.S. enterprises will need to upload the "Enterprise extension application statement," which can be downloaded on the extension application page, as a part of the renewal process. If there are any unfinished procedures related to renewal, cancellation, or revocation, GACC will not renew the registration.

Registration Renewal Process for Self-Registration

U.S. enterprises should log into CIFER and select "Application for Extension" from the left menu. U.S. enterprises that self-register can submit the renewal request directly to GACC. If GACC approves the renewal request, GACC will notify the U.S. enterprise and extend the registration validity period for 5 years. If GACC does not approve or returns the renewal request, U.S. enterprises can find the reason for the rejection or return through custom feedback under the

following: Integrated Query → Application Form Query → Custom Feedback → View (**Note:** translations can vary with “integrated query” appearing under a slightly different name). If the renewal application is rejected or returned, U.S. enterprises will need to address the comments from GACC and restart the renewal request.

Registration Renewal Process through a Competent Authority

The registration renewal process for competent authority recommended facilities is initiated by the U.S. enterprise following the same process outlined for self-registered registrations, by logging into CIFER and selecting “Application for Extension” from the left menu. However, these renewal applications require competent authority approval prior to GACC review. If the competent authority has questions regarding the renewal application, the competent authority can submit comments or requests back to the enterprise via the CIFER system. U.S. enterprises can see the competent authority comments under the following: Integrated Query → Application Form Query → Institution's Receipt → View (**Note:** translations can vary with “integrated query” appearing under a slightly different name).

As part of this process for FDA-regulated enterprises, FDA will review the current status of the enterprise’s listing in the FDA Export Listing Module (ELM) (<https://www.fda.gov/food/food-export-lists/online-applications-export-lists>) for the given product category undergoing registration renewal to ensure continued good regulatory standing by the enterprise. Please note that, **in addition to and separate from CIFER renewal**, enterprises must update and resubmit their ELM applications to FDA every two years to remain listed. Beginning six months prior to an application's expiration date, the ELM will send three reminder emails to the contacts listed on the ELM application. To ensure that these reminders are received, FDA highly recommends that enterprises specify two different people as contacts on the ELM application. If the application is not resubmitted prior to the expiration date, the enterprise will be removed from the ELM system and will not be eligible for registration renewal in the CIFER system. **Please note the ELM and CIFER application processes are completely separate, and the two systems do not exchange any registration or listing data between them.**

The competent authority will send the renewal application to GACC if the enterprise remains in good regulatory standing with the competent authority and there are no further questions. If GACC does not approve or returns the renewal request, U.S. enterprises can find the reason for the rejection or return through custom feedback under the following: Integrated Query → Application Form Query → Custom Feedback → View (**Note:** translations can vary with “integrated query” appearing under a slightly different name). U.S. enterprises will need to address the comments from GACC and restart the renewal request.

Appendix I: Helpful Resources for U.S. Exporters

Decree 248

- [GACC Official Website](#)
- [Decree 248 Original Announcement](#)
- [Decree 248 Translation](#)
- [CIFER Site for Registration](#)
- [CIFER Site for Verification of Registered Companies](#)

Food and Drug Administration

- [FDA Notice on Decree 248](#)
- [FDA Food Export Lists](#)
- [Online Applications for Export Lists](#)
- [FDA FEI Search Portal](#)
- [Video on ELM Process](#)

USDA Food Safety and Inspection Service

- [Export Library for China](#)

USDA Foreign Agricultural Service GAIN Reports

- [New USA-Based Registration Applications Under Decree 248 | CH2024-0070](#)
- [Decree 248 Product List Update - November 2024 | CH2024-0153](#)
- [Guidance on Unofficial Facility Registration Websites for Food and Ag Exports | CH2024-0066](#)
- [Introduction to Facility Registration Under Decree 248 | CH2022-0064](#)
- [Information for Industry Regarding Decree 248 and CIFER | CH2023-0088](#)
- [Decree 248 Unofficial Self-Registration Guide for Overseas Food Facilities | CH2021-0135](#)

Attachments:

No Attachments.