WORKING DOCUMENT FOR DECREE 248 MEETING WITH GACC ON 17 FEBRUARY 2023

**Based on questions from EU and answers from China GACC on Decree 248 (December 2022)**

**General questions**

**关于第248号令欧盟的问题以及海关总署的答复（2022年12月）**

**一般性问题**

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| **Question No** | **General topic 整体问题** | **Question by EU 欧盟的问题** | **Response by GACC 海关总署的答复** |
| **1** | **GACC Contact Point**  **海关总署联系方式** | The availability of GACC to resolve pending registration issues should be urgently enhanced.  Can GACC confirm (if need be, update) the GACC contact details (email/phone) available to answer (preferably in English language) questions from EU Member States Competent Authorities and EU industry?  So far the following email is seen as GACC primary contact on Decree 248 [shipinjuyichu@customs.gov.cn](mailto:shipinjuyichu@customs.gov.cn)  ***New:***  ***Confirmation of email contacts for the 18 product categories (article 7) is welcome, what about communication channels for other product categories (article 9)?***  ***If possible phone contacts would also be welcome (in addition to email contacts) to allow rapid communication***  海关总署应尽快提升效率解决未处理的注册问题。  海关总署能否确认（如有必要，更新）详细联系方式（电子邮件/电话），以（最好是英语）回答来自欧盟成员国主管当局和欧盟企业的问题？  到目前为止，以下电子邮件被视为海关总署第248号令的主要联系人[shipinjuyichu@customs.gov.cn](mailto:shipinjuyichu@customs.gov.cn) | 为快速解决企业注册过程中遇到的具体问题，欧方可将相关问题和截图发中方指定联系邮箱：  肉与肉制品、燕窝与燕窝制品、肠衣、蜂产品、蛋与蛋制品、食用动物油脂的问题可发至：  [shipinjuyichu@customs.gov.cn](mailto:shipinjuyichu@customs.gov.cn)  食用植物油、包馅面食、大米、谷物制粉工业产品和麦芽脱水蔬菜调味料的问题可发至：sajec@customs.gov.cn  乳品、特殊膳食食品、保健食品的问题可发至：shipinjusanchu@customs.gov.cn  水产品的问题可发至：[shipinjusichu@customs.gov.cn](mailto:shipinjusichu@customs.gov.cn)  In order to quickly solve the specific problems encountered during the registration process of the enterprise, the European party can send relevant issues and screenshots to the Chinese designated contact mailbox:  Problems related to meat and meat products, bird's nest and bird's nest products, casing, bee products, eggs and egg products, and edible animal-origin fat, can be sent to:  [shipinjuyichu@customs.gov.cn](mailto:shipinjuyichu@customs.gov.cn)  Problems related to edible plant oil, stuffed pasta products, rice, grain powder industrial products and malt ,dehydrated vegetables , and seasonings, can be sent to [sajec@customs.gov.cn](mailto:sajec@customs.gov.cn)  Problems related to dairy products, ,special dietary foods, health foods can be sent to: [shipinjusanchu@customs.gov.cn](mailto:shipinjusanchu@customs.gov.cn)  **Problems related to wines and spirits can be sent to:** [**shipinjusanchu@customs.gov.cn**](mailto:shipinjusanchu@customs.gov.cn)  **有关葡萄酒和烈酒的问题可发送至**：**shipinjusanchu@customs.gov.cn**  Problems related to seafood and fishery products can be sent to: [shipinjusichu@customs.gov.cn](mailto:shipinjusichu@customs.gov.cn)  **A phone hotline on Decree 248 is also available at 12360**  **也可拨打海关热线 12360 咨询有关第 248 号令的问题** |
| **2** | **Decree 248 guidelines / announcements**  **第248号令的指南/公告** | The EU would welcome an update/overview from GACC on the main changes introduced since 1 January 2022 (entry into force) regarding Decree 248 guidelines or announcements to competent authorities and/or exporting establishments industry  欧盟欢迎海关总署提供关于第248号令自2022年1月1日实施起，对主管当局和/或出口机构行业公告或指南的主要变化的最新情况/概述 | 248号令实施以来，相关公告、释义、指南、解读等材料，可登录注册网站查询  Please refer to the registration website cifer.singlewindows.cn for relevant announcements, interpretation, guidelines, and other materials regarding Decree No.248. |
| **3** | **CIFER electronic registration system**  **进口食品境外生产企业电子注册系统** | The EU would welcome an update/overview from GACC on the main changes introduced since 1 January 2022 (entry into force) regarding the CIFER electronic registration system (following various technical upgrades)  ***New:***  ***Is GACC planning to update user manuals according to the latest CIFER upgrades?***  ***It is still to be confirmed that it is possible to apply for renewal within 0-3 months before expiry***  ***More details would be welcome on the functioning of the “reminder function” for renewals (for instance timing and format for the reminder notification).***  欧盟欢迎海关总署提供自2022年1月1日实施起，有关进口食品境外生产企业电子注册系统（在各种技术升级后）的主要变化的最新情况/概述 | 根据企业和各国主管部门使用过程中提出的问题和建议，注册系统在持续升级中。如，增加了HS和CIQ编码名称的英文版；解决部分企业可在有效期到期前0-3个月内申请延续注册的功能等；增加了延续注册到期前提醒功能；在海关总署外网进口食品境外生产企业注册信息查询功能中增加暂停进口、恢复进口等查询功能。  According to the questions and suggestions raised by enterprises and competent authorities of various countries during the process of use, the registration system is continuously being upgraded. For example, the English version for HS and CIQ code has been added.  **An updated version of the CIFER user manual is expected to be released in the coming weeks.**  **CIFER 用户手册的更新版本预计将在未来几周内发布。**  The issue of some companies applying for registration renewal within 0-3 months before the expiration of the validity period has been solved; a reminder function before the expiration of the renewal registration has been added **(an email is sent 6 months before registration expiry注册到期前6个月将发邮件提醒);** Inquiry functions such as suspension of import and resumption of import have been added to the registration information inquiry page of overseas establishments.  **For companies with specific reasons, the development of a new feature in the system is needed.**  **对于有特定原因的公司，需要在系统中开发新功能。** |

**Questions related to authority registration (Article 7)**

**有关主管当局注册的问题（第七条）**

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| **Question No** | **General topic 整体问题** | **Question by EU欧盟的问题** | **Response by GACC海关总署的答复** |
| **4** | **Registration /**  **Product Categories / Scope**  **登记/**  **产品类别/范围** | By letter of 27 October 2022 GACC informed exporting countries that several product categories (mainly primary agricultural products) will be exempt from Decree 248.  General questions:  Could GACC specify the HS codes of the products exempted from Decree 248 further to GACC letter of end October 2022?  ***New: Confirmation of HS codes for products not covered anymore by Decree 248 is still welcome to clarify/confirm status of specific products (for instance cereal grains and cereal products (flour, flakes) or oilseeds and oil, or nuts/grains raw or packed ready-to eat) – see also specific questions below***  Could GACC clarify the registration procedure to be followed for product categories not covered anymore by Decree 248?  ***New: for products which have been confirmed to be exempted from Decree 248, details would still be welcome to confirm the registration procedure by Department of Animal and Plant Quarantine – see also pecific questions below***  Specific questions:  Could GACC confirm that establishments producing fresh and dehydrated vegetables and dried beans, condiments or edible grains do not fall anymore under the scope of Decree 248 and should not be registered in CIFER?  Does the category ‘edible grains’ include oat flakes and flour?  Will establishments producing edible fats and oils also be exempted?  Will the registration through the Department of Animal and Plant Quarantine of GACC require a recommendation by the competent authority?  What are the procedures foreseen for this registration? Can establishment register themselves or must this be done by the competent authority?  If a registration must be done by e-mail to the Department of Animal and Plant Quarantine, should this e-mail be sent by the competent authority of the country of origin, or by the relevant Embassy in Beijing?  Where will a list of establishments approved by the Department of Animal and Plant Quarantine will be published and how it could be updated?  通过2022年10月27日的信函，海关总署通知出口国有几类产品（主要是初级农产品）将免于适用第248号令。  一般性问题：  根据海关总署 2022年10月底的信函，海关总署能否具体说明豁免于248号令的产品的HS编码？  海关总署能否说明第248号法令不再涵盖的产品类别应遵循的注册程序？  具体问题：  海关总署能否确认，生产新鲜和脱水蔬菜和干豆类、调味品或食用谷物的企业不再属于248号令的范围？不应该在进口食品境外生产企业系统注册？  “食用谷物 ”这一类别是否包括燕麦片和面粉？  生产食用脂肪和油类的企业是否也被豁免？  通过海关总署动植物检疫部门注册是否需要主管当局的推荐？  这种登记的程序是什么？企业可以自行登记，还是必须由主管当局完成？  如果必须通过电子邮件向动植物检疫局进行登记，该电子邮件应该由原产国的主管当局发送，还是由驻北京的大使馆发送？  经动植物检疫局批准的机构名单将在哪里公布？如何更新？ | 所有食品局管辖产品均应通过注册系统进行注册，相应产品是否由官方推荐注册/企业自行申请注册建议通过注册系统进行查询。  职能调后划出食安局的相关产品的生产企业已在动植司发布，相关HS编码已不再H2018系统校验519证书。  All products under the jurisdiction of the Food Safety Bureau have to be registered through the registration system. Whether the corresponding product is recommended by official authorities for registration or via self-registration is to be checked through the registration system.  After internal reorganization of responsibilities, the Department of Animals and Plants Quarantine have already published the manufacturers of related products designated by the Food Safety Bureau, and the relevant HS codes are no longer validated by H2018 system for 519 certificates.  **The HS codes for products still covered by Decree 248 are available on the CIFER website**  **248号令涵盖的产品海关编码在CIFER网站上可查询。**  **For products not covered anymore by Decree 248 the contact email from Department or Animal and Plant Quarantine is Email [pqdgacc@126.com](mailto:pqdgacc@126.com)**  **248号令不涵盖的产品移交海关总署动植司管理，联系邮件是[pqdgacc@126.com](mailto:pqdgacc@126.com)** |
| **5** | **Registration / Product Categories / Scope**  **登记/**  **产品类别/范围** | GACC has registered EU exporters of edible grains in the CIFER system (but not warehouses). By summer 2023, these exporters of edible grain must fill in the checklists on conforming with China’s food safety requirements. But how can they do so, if they are not involved in the manufacturing of these products?  Or is this requirement no longer valid because edible grains are exempt from CIFER andare exporters of edible grains not required to register under the Animal and Plant Quarantine Department?  海关总署已经在进口食品境外生产企业系统中注册了欧盟的食用谷物出口商（但不是仓库）。到2023年夏季，这些食用谷物出口商必须填写关于符合中国食品安全要求的检查表。但是如果他们不参与这些产品的生产，他们如何做到？  或者说这一要求不再有效，因为食用谷物被豁免在进口食品境外生产企业系统注册，而且食用谷物的出口商不需要在动植物检疫部门登记？ | 属于食安局管辖的食用谷物产品生产企业应通过注册系统进行注册，不参与生产加工的贸易商（出口商）无需通过注册系统进行注册。  Manufacturers of edible grain products under the jurisdiction of the Food Safety Bureau should register through the CIFER registration system, and traders (exporters) who do not participate in production and processing do not need to register through the CIFER registration system. |
| **6** | **Registration / Product Categories / Scope**  **登记/**  **产品类别/范围** | GACC indicated that they would register in CIFER the list of cold stores that can export dairy products to the Chinese market. However, to date, no such list is available on the GACC website.  When and how will GACC publish the registration of cold stores eligible for export of dairy products to China?  ***New: clarification of the status of “independent” cold storage facilities is still welcome (ie cold storages “only” exporting, without processing)***  海关总署表示将在进口食品境外生产企业系统里注册可以向中国市场出口乳制品的冷库名单。但到目前为止，海关总署网站上还没有这样的名单。  海关总署将在何时以及如何公布有资格向中国出口乳制品的冷库的注册情况？ | 因不存在公共冷库单独对华出口申报产品的情况，乳品生产加工企业不需要单独就冷库进行注册。注册系统中企业的加工类型中已区分加工、加工与存储（冷库），企业名单可以在海关总署网站查询。  As there are no public cold storage facilities that solely declare products for export to China, dairy production and processing enterprises do not need to register cold storages separately.  The processing types of enterprises in the registration system are differentiated into processing, processing and storage (cold storage). The list of establishments can be found on the website of the General Administration of Customs.  **A cold storage facility in charge of storing “only” (no processing) and exporting needs to be registered – GACC will consider to add the option into CIFER.**  **负责“仅”存储（不加工）和出口的冷藏设施需要注册——CIFER 研究添加注册“仅存储”设施的选项** |
| **7** | **Registration / Product Categories / Scope**  **登记/**  **产品类别/范围** | Recently, GACC has made to some updates on HS codes, without notifying other countries, which has caused many disruptions in the clearance of imports into China.  Could GACC inform competent authorities of exporting countries of updates of HS codes before they cause blockages?  ***New: information about update of HS codes is very important and still a valid point to be addressed to avoid trade disruption***  最近，海关总署在没有通知其他国家的情况下，对HS编码进行了一些更新，这对中国进口通关带来了很多干扰。  海关总署能否在HS编码更新之前通知出口国的主管当局，以免造成堵塞？ | **GACC will send notification on any future update of HS codes**  **海关总署将及时通报 HS 编码的任何未来更新。** |
| **8** | **Registration renewals**  **延续注册** | General questions:  The EU would welcome clear guidelines from GACC on the procedure to follow and documentation required for registration renewals (Article 20)  This would greatly facilitate procedure as it will allow to timely prepare all the necessary documents in order to have a smooth procedure of verifying and submission into the CIFER system.  In addition, the EU would like to stress that, due to technical issues with CIFER, EU Member State authorities and EU industry have been  facing difficulties related to the renewals under Decree 248 of existing approvals.  As proposed by GACC, EU Member States have communicated to GACC list of establishments for which renewals were pending. The EU hopes that GACC will process these “pending renewals” as soon as possible.  In the meantime the EU would like to reiterate its request (see EU letter to GACC of 28 October 2022) that GACC ensure that existing approvals remain valid until the renewal process under Decree 248 is completed.  ***New:***  ***Bilateral contacts to address specific cases are welcome but “registration renewals” remain a major pending issue so existing approvals should remain valid until renewal process under Decree 248 is completed***  欧盟欢迎海关总署就延续注册所需的程序和文件提供明确的指导（第二十条）。  这将大大加速进程，将允许及时准备所有必要的文件，以便顺利地进行核实和提交到进口食品境外生产企业注册系统。  此外，欧盟想强调的是，由于进口食品境外生产企业注册系统的技术问题，欧盟成员国和欧盟企业一直面临着根据第248号令延续现有批准方面的困难。  根据海关总署的建议，欧盟成员国已经向海关总署通报了有待延续的机构名单。欧盟希望海关总署能尽快处理这些“待延续”的问题。  同时，欧盟希望重申其要求（见欧盟2022年10月28日致海关总署的信函），即在第248号令规定的延续程序完成前，海关总署应确保现有批准仍然有效。 | 注册系统中，已提供企业申请延续注册所需材料清单和模板。包括欧盟企业在内的各国上千家企业已如期顺利完成延续注册。企业在申请延续注册过程中遇到的具体问题，可提供中方研究。  In the registration system, a list of materials and templates required for establishments to apply for renewal of registration are provided.  Thousands of companies from various countries, including EU companies, have successfully completed the registration renewal as scheduled.  Specific problems encountered by enterprises in the process of applying for renewal of registration, can be raised to the Chinese side for consideration/analysis. |
| **9** | **Registration renewals**  **延续注册** | Specific questions:  For establishments whose registrations will expire within 3-6 months it must urgently be clarified if *‘Modification of the establishment´s profile’* or *‘Request for extension’* should be applied for first. The EU-Member States received different replies from GACC officials.  The information system CIFER does not allow for parallel procedures for renewing approvals and updating information. These two operations each require a certain amount of time and have very close deadlines for completion. Both procedures must be finished three months before the expiry of the current registration. This is almost impossible for companies to meet both requirements at the same time.  Can GACC clarify the sequence of steps that must be undertaken for the re-registration of establishments?  Could GACC extend the limit time for one or both of these operations in order to avoid an interruption in exports?  Could GACC allow for the parallel processing of ‘modifications’ and ‘extensions’?  For dairy products the import authorizations of many companies will expire, and the procedures for the renewal of such authorizations are yet to be clarified. A communication from the GACC on the matter is urgently necessary, in particular as regards the situation of the authorized "infant formula" establishments, whose authorizations will expire at the end of 2022.  ***New:***  ***The two procedures for “modification” application and “extension” application are burdensome and somewhat repetitive. Are both the “modification” application and “extension” application required, in particular for products which registration will expire in 2023?***  ***Taking into account that the documentation required is very similar, would it be possible to apply directly for “extension” without applying for “modification”?***  ***Please also address renewals for “fishery products”***  具体问题：  对于那些注册将在3-6个月内到期的机构，必须尽快澄清是否应首先申请 “修改机构简介 ”或 “申请延期”。欧盟成员国从海关总署官员那里得到了不同的答复。  进口食品境外生产企业注册系统不允许延续注册和更新信息的平行程序。这两项业务各需要一定的时间，而且完成的最后期限非常接近。这两个程序都必须在当前注册到期前三个月完成。这对企业来说，几乎不可能同时满足这两项要求。  海关总署能否澄清机构重新注册必须采取的步骤顺序？  海关总署能否延长其中一项或两项操作的时限，以避免出口的中断？  海关总署能否允许平行处理 “修改 ”和 “延续”？  对于乳制品来说，许多企业的进口许可将到期，而更新这些许可的程序还有待明确。迫切需要海关总署就此问题进行沟通，特别是关于许可的 “婴儿配方 ”企业的情况，其许可将于2022年底到期。 | 境外乳制品生产企业需按时提出注册延续申请。对于注册有效期将要到期的企业，需要预留出足够的时间，中方也会组织专家加快评审。2022年底到期的婴配乳品企业目前除企业不再申请延续的以外，都已完成了注册延续工作。  境外肉类、肠衣、燕窝与燕窝制品、蜂产品、蛋与蛋制品、食用动物油脂，水产品 的生产企业：  1. 如生产企业状态正常且未提交任何申请，可在规定时间内，自由选择优先进行变更或延续。  2. 如企业申请变更，同时面临延续时限问题，请由主管机构提交照会材料予以说明，并提供企业清单，中方将组织专家加快评审。  3. 对于正申请变更或处于暂停状态的企业，如无法在规定时间内进行延续申请，请由主管机构提交照会材料说明具体原因，并提供企业清单，中方将评估并研究解决方案。  Overseas dairy product manufacturers need to submit registration renewal applications on time.. For enterprises whose registration validity period is about to expire, sufficient time needs to be reserved, and China Customs will organize experts to expedite the review. Infant formula dairy companies that expire at the end of 2022 have all completed the registration renewal, except for those companies that no longer apply for renewal.  For overseas manufacturers of meat, casings, bird’s nest and bird’s nest products, bee products, eggs and egg products, and edible animal fats, fishery products:  1. If the establishment has a normal status and has not submitted any application, it can still choose to submit an application for expedited changes or renewal within the specified time.  2. If the establishment applies for change and faces the problem of the extension time limit, the competent authority can submit a verbal note to explain and provide a list of establishments. China Customs will organize experts to expedite the review.  3. For establishments that are applying for change, or, are in a suspended state, if they cannot submit the renew request within the specified time, the competent authority should submit a note explaining the specific reasons and provide the establishments list. China Customs will evaluate and seek solutions.  **GACC will study the possibility of simplifying the procedure to avoid duplication between “modification” application and “extension” application**  **海关总署将研究简化程序的可能性，避免“变更”申请和“延期”申请重复。** |
| **10** | **Registration / Supplementary Information**  **注册/补充资料** | General questions:  The EU would welcome clear guidelines from GACC on the procedure to follow for existing registrations for which supplementary information will need to be provided by 30 June 2023  This would greatly facilitate procedure as it will allow to timely prepare all the necessary documents in order to have a smooth procedure of verifying and submission into the CIFER system.  In addition, due to various technical issues still faced with CIFER, the EU would like to reiterate its request (see EU letter to GACC of 28 October 2022) to postpone the deadline for supplementary information for one year from 30 June 2023 to 30 June 2024  ***New:***  ***The deadline of 30 June 2023 is still a major concern and a possible source of trade disruption. Clear guidance on how to provide “supplementary information” is still welcome (for instance is 30 June 2023 the deadline for the submission of information at the level of national competent authorities or at the level of GACC?)***  一般性问题：  欧盟欢迎海关总署就需要在2023年6月30日前提供补充材料的现有注册程序提供明确的指导。  这将大大加速进程，将允许及时准备所有必要的文件，以便顺利地进行核实和提交到进口食品境外生产企业注册系统。  此外，鉴于进口食品境外生产企业注册系统面临各种技术问题，欧盟希望重申其要求（见欧盟2022年10月28日致海关总署的信函），将补充信息的最后期限推迟一年，从2023年6月30日推迟到2024年6月30日。 | 中方建议欧方进一步梳理距离有效期届满不足3个月的企业，并提供企业名单及未能按规定提出延续注册申请的原因，中方将尽快进行评估并研究解决方案。关于欧方提出希望将企业补充信息截止日期推迟到2024年6月事，中方需要说明的是，自2022年1月1日至2023年6月30日，中方给予企业补充材料的时间远超过世界贸易组织（WTO）规定的6个月过渡期，且现距2023年6月30日尚有近8个月的充足时间。中方建议欧方主管部门敦促相关企业尽快按要求补充相关材料。如个别企业确因不可抗力不能按时补充材料，建议欧方及时来函说明有关情况，中方可考虑针对性地研究解决。  China Customs suggests that the European side further inventories companies that are within 3 months from expiry of the validity period, and provide a list of companies and the reasons for failing to file renewal applications as required.  We will evaluate and study solutions as soon as possible. Regarding the EU proposal to postpone the deadline for supplementary information to June 2024, The Chinese side wants to point out that China’s stipulated time limit (January 1, 2022 to June 30, 2023) for providing supplementary materials of companies far exceeds the 6-month transition period as stipulated by the World Trade Organization (WTO), and there are still another 8 months of ample time before June 30, 2023.  China suggests that the European competent authorities urge relevant companies to supplement relevant materials as required as soon as possible. If individual companies are indeed unable to supplement materials on time due to force majeure, the Chinese side advices the European side to send a letter to explain the relevant situation in a timely manner, so we can consider targeted solutions. |
| 11 | **Registration / Procedure**  **注册/程序** | In some cases, applications are rejected by the GACC referring to incorrect filling of specific entry fields, while other applications, in which the same entry fields are filled identically, are approved by the GACC. Instructions for filling and interpretation of entry fields are often lacking or the user manual does not provide the necessary level of detail. Examples:   * “Number of official inspection and quarantine personnel in the factory". What does “official inspection and quarantine personnel in the factory" mean? Representatives of the Competent Authority? Is it expected that these personnel is physically present in the factory all the time? These are not legal requirements under the EU Food Law, although establishments must operate under official control. However, if “0" is entered in this field, GACC will often reject the application. * “Accredited agency". What does it mean, and what should be entered in this field, if the establishment does not use an accredited agency? * “Plant establishment time", “Date of reconstruction and expansion", “Production license issued by the competent authority of the country (region) where it is located" and the correlation between these three fields. It appears that GACC compares the dates entered in these fields and may reject an application if the entries are considered inconsistent. However, in some cases, the letter of approval issued by the competent authority was updated due to minor/administrative changes (without any reconstruction or expansion of the establishment), and the date of issuance of the letter of approval does therefore not match the "Plant establishment date". How should this be accounted for to avoid that the application is rejected?   Can GACC provide more guidance on required data entries and formats and avoid inconsistent procedures?  ***New:***  ***More specific answers to each of the specific questions still welcome***  在某些情况下，海关总署拒绝了一些申请，原因是具体的输入内容填写不正确，而其他申请中相同的输入内容却被海关总署批准。往往缺乏填写和解释输入内容的说明，或者用户手册没有提供必要的详细说明。例如：  - “工厂的官方检验检疫人员数量”。工厂中的官方检验检疫人员是什么意思？主管当局的代表？是否希望这些人员一直都在工厂里？尽管企业必须在官方控制下运作，但这不属于欧盟食品法的法律规定范畴。但是，如果在这一栏输入 "0"，海关总署通常会拒绝申请。  - “经认可的机构”。如果该机构不使用经认可的机构，这意味着什么，应该在这一栏中输入什么？  - “工厂建立时间”、“重建和扩建日期”、“所在国家（地区）主管当局颁发的生产许可证”以及这三项内容的关联性。海关总署比较这些内容输入的日期，如果认为输入的内容不一致，可能会拒绝申请。然而，在某些情况下，主管当局签发的许可证因小的/行政上的变化而被更新（没有重建或扩建），因此许可证上的签发日期与 “工厂成立日期 ”不一致。这一点应如何解释，以避免申请被拒绝？  海关总署能否就所需的内容条目和格式提供更多指导，避免程序不一致？ | 1.工厂官方检疫人员一般是指官方主管机构驻厂兽医或检疫人员。  2. “工厂建立时间”、“重建和扩建日期”、“所在国家（地区）主管当局颁发的生产许可证”这三个时间逻辑合理、如实填写即可，可提交上传相关证明材料。  1. The official inspection and quarantine personnel of the factory generally refers to the resident veterinarian or inspection and quarantine personnel of the official competent authority at the factory.  2."Plant establishment time", " Date of reconstruction and expansion", “Production license issued by the competent authority of the country (region) where it is located " are logical questions and can be filled in truthfully with relevant certificates/proof submitted and uploaded. |
| **12** | **Registration / Procedure**  **注册/程序** | The instructions and explanations from the GACC as noted in "customs feedback" field are often difficult to interpret. Examples:   * “There is no registration number in China, and the *application* type is wrong". This message was provided by GACC for establishments that were already registered for export to China and did have a Chinese registration number in CIFER. It is not possible to apply for modification without having an existing registration for export to China in CIFER. * “Please add the name of the agency". The message refers to the field “Accredited agency". As noted above, the interpretation of this field is unclear and instructions are missing. * “Licensed production certificate issued by competent authority without official stamp". Letters of approval issued by the competent authority are not always stamped but may be signed by the official inspector and printed on paper with the logo of the competent authority. * “Due to system reasons, please fill in 1 for cooling capacity first." It isunclear what should be corrected and why. What is the meaning of “system reasons"? * “After review by experts, see the attachment for items that do not meet the requirements". However, an attachment is not always provided. * “The enterprise fills in the number of official inspection and quarantine personnel stationed in the factory, but the stationed agency fills in none, there is a contradiction, and the change is not approved." IAs noted above, instructions for filling and interpretation of the entry fields “Number of official inspection and quarantine personnel in the factory" and “Accredited agency" are needed to avoid inconsistent entries. * “The name of the enterprise in the enterprise statement and the key points of the comparison check is inconsistent with the system, and there is no processing flow chart, please make corrections". However, in CIFER, “Process flow chart" is not marked with '\*' and thus should not be a mandatory field for data entry according to the user manual.   ***New:***  ***More specific answers to each of the specific questions still welcome***  在 “海关反馈 ”一栏中海关总署的指示和解释往往难以理解。例如：  - “在中国没有注册号，申请类型有误”。这条信息是海关总署为那些已经注册出口到中国的机构提供的，并且在进口食品境外生产企业注册系统中确实有一个中国的注册号。如果在进口食品境外生产企业注册系统中无已有的对中国出口登记，就无法申请修改。  - “请添加代理机构的名称”。该信息指的是“经认可的机构”这一内容。如上所述，这个内容的解释不清楚，也没有说明。  - “主管当局颁发的没有公章的生产许可证书”。主管当局出具的批准函并不总是加盖公章，但可能由官方检查员签字，并在纸上印有主管当局的标识。  - “由于系统原因，请先填写1的制冷量”。不清楚应该改什么，为什么要改。“系统原因”是什么意思？  - “经专家评审，不符合要求的项目见附件”。但是，并不总是提供附件。  - “企业填写驻厂官方检验检疫人员数量，但驻厂机构没有填写，存在矛盾，不批准变更”。如上所述，需要对“驻厂官方检验检疫人员数量”和 “驻厂机构”这两个录入内容的填写和解释进行说明，以避免出现录入不一致的情况。  - “企业报表中的企业名称与比对检查要点与系统不一致，且无处理流程图，请改正”。但在进口食品境外生产企业注册系统中，“加工流程图”没有标注‘\*’，因此根据用户手册，不应成为数据录入的必填项。 | 肉类企业申请时“企业制冷及贮存能力”中的制冷能力为必填项，系统已完成优化，当企业填写0时也可以正常流转。  When meat enterprises register in the system, cooling capacity in "Enterprise Refrigeration and Storage Capacity" is a mandatory item. The system has been optimized, and when the enterprise fills in 0, it can be transferred normally. |
| **13** | **Registration / Procedure**  **注册/程序** | The same application may be returned several times by GACC for different reasons. We have sent applications that were returned first time for one reason, then corrected and resubmitted and returned again for a new reason not mentioned before. This causes unnecessary delays and administrative burden.  Can GACC address all issues concerning individual applications in one single feedback message?  同一份申请可能因为不同的原因被海关总署退回几次。我们发送的申请第一次因一个原因被退回，然后修改后重新提交，又因之前未提及的新原因再次被退回。这造成了不必要的延误和行政负担。  海关总署能否在一个反馈信息中提出对单个申请的所有问题？ | 目前企业的初次申请和再次申请可能由不同的专家审核，初审专家没有发现的问题可能会被再审专家发现，因此不能保证在一次反馈中提出所有问题，但会尽量避免。  At present, the initial application and re-application of establishments may be reviewd by different experts, and problems not found by the first review experts may be found by the re-examination experts. Therefore, we cannot guarantee that all problems will be raised in the first time of feedback, but we will try our best to avoid them. |
| **14** | **Registration / Procedure**  **注册/程序** | Member States cannot currently file registrations for establishments that are currently suspended by GACC. GACC had announced that these establishments can be registered (indicating their suspension status).  When and how will GACC open the registration of establishments that are temporarily suspended?  ***New:***  ***The initial question may have been misunderstood – in case establishments are temporarily suspended (for instance because of sanitary reasons) it should still be possible to register them under Decree 248 (indicating their suspension status)***  成员国目前不能为被海关总署暂停的机构申请注册。海关总署已经宣布，这些机构可以注册（说明其暂停状态）。  海关总署何时以及如何开放被暂停的机构的注册？ | 根据248号令，企业被暂停表示企业存在不符合注册要求的情形，企业应按要求尽快整改。企业重新符合注册要求前，不能进行其他操作。  According to Decree No. 248, suspension of establishments indicates that they failed to meet the registration requirements, and the establishment should rectify in accordance with the requirements as soon as possible. The establishments cannot perform any other operations until they meet the registration requirements again.  **GACC will study individual cases notified by EU Member States regarding establishments temporarily suspended and for which a registration/renewal is needed**  **海关总署将研究欧盟成员国通报的关于暂停出口且需要注册/延期的企业个案。** |
|  |  |  |  |
|  |  | ***New:***  ***The bilateral communication proposed by GACC for various questions below on “registration/procedure” is welcome. However EU would like to reiterate that trade should not be disrupted while pending applications are being reviewed by GACC***  ***More specific answers to the specific questions below are still welcome*** |  |
| **15** | **Registration / Procedure**  **注册/程序** | GACC has not provided passwords for several companies; especially those added to CIFER by GACC after 1.1.2022. Neither do these companies appear when logged into the F user account of the Competent Authority (account management).  How can companies access accounts without a password?  How can the Competent Authority manage these accounts?  海关总署没有提供几家公司的密码，特别是2022年1月1日之后海关总署添加到进口食品境外生产企业注册系统的公司。这些公司在登录主管当局的F用户账户（账户管理）时也没有出现。  公司如何在没有密码的情况下进入账户？  主管当局如何管理这些账户？ | 请欧方提供具体企业信息（国家/地区、所在国注册号），中方将核实后协助解决。  The European side is requested to provide specific information (country/region, country registration number) of the companies. The Chinese side will assist in solving the problem after verification. |
| **16** | **Registration / Procedure**  **注册/程序** | The CIFER interface seems to be particularly unsuitable for warehouses. For a warehouse, it is not possible to define a list of HS codes in advance (everything depends on the customers). The "meat" and "aquatic products" are not adapted to warehouses.  Would it be possible for warehouses that all HS codes of a category are covered by default, or else that there is no HS code requirement for warehouses and only a product category requirement?  Warehouses wishing to apply for poultry renewal: Warehouses in Member States currently suspended because of avian influenza were not integrated into CIFER.  GACC should not to block the registration of warehouses only because trade is temporally suspended.  ***New:***  ***Please also address warehouses for fishery products***  进口食品境外生产企业注册系统似乎特别不适用于仓库。对于一个仓库来说，不可能事先定义HS编码清单（一切取决于客户）。”肉类”和“水产品”也不适用于仓库。  对于仓库来说，是否可以默认涵盖一个类别的所有HS编码，或者对仓库没有HS编码要求，只有产品类别要求？  仓库希望申请更新家禽。目前因禽流感而暂停的成员国仓库没有被纳入进口食品境外生产企业注册系统。  海关总署不应仅仅因为贸易暂时中止而阻止仓库的注册。 | 肉类产品的贮存冷库需以独立企业在CIFER系统内进行注册，并且要明确申请的产品类别所有CIQ编码。  肉类产品的贮存冷库在申请注册时可不填写“生产对应关系”。  The cold storage warehouse for meat products must be registered in the CIFER system as an independent enterprise, and specify of all CIQ codes of the applied-for product categories.  The cold storage warehouse of meat products do not have to fill in the “corresponding relations of production” when applying for registration. |
| **17** | **Registration / Correction / Amendments**  **注册/变更/修改** | Sometimes there is a wrong assignment of manufactures to respective competent authorities. Accordingly, the authority in charge cannot perform any activities necessary for registration procedures.  Assignments of competent authorities should be changed by the competent authority.  有时会出现将制造商错误地分配给各自的主管当局的情况。因此，主管当局不能完成注册程序所需的要求。  主管当局应能够变更分配。 | 企业在办理变更、延续、注销、复查、整改业务时，可以重新选择主管当局。系统也会根据企业提交的食品种类自动匹配该国家相对应的主管当局。如果欧方认为食品种类与主管当局匹配不准确，请欧方来函提供食品种类对应的正确主管当局名称，中方将协助在系统中予以调整。  The enterprise can re-select the competent authority when handling modifications, renewal, cancellation, re-examination and rectification. The system will also automatically match the corresponding competent authorities of the country according to the type of food submitted by the enterprise. If the European side believes that the food type and the competent authority do not match accurately, please send a letter to provide the correct name of the competent authority corresponding to the food type. The Chinese side will assist in making adjustments in the system. |
| **18** | **Registration / Correction / Amendments**  **注册/变更/修改** | If an establishment files for a new registration because of a change of the export country registration number (for example after a change in management), can the establishment continue to export its products under the previous registration number, until the application is approved and a new registration number is allocated?  如果一个机构因为出口国注册号的改变而申请新的注册（例如在管理层改变之后），该机构是否可以继续用以前的注册号出口其产品，直到申请被批准和新的注册号被分配？ | 在新的注册号未获得批准之前，企业可使用原有注册号继续出口产品。新的注册号申请通过后，第二个工作日起运的产品应使用新的注册号；原有在华注册编号将自动失效，原有注册资格被注销，但在新注册号批准之前已起运的在途货物不受影响，可继续使用原有注册号进行进口申报。  Before the new registration number is allocated, enterprises can continue to export its products under the previous original registration number. After the application is approved, the new registration number must be used for products shipped starting the next working day. The previous registration number in China will automatically expire and the previous registration qualification will be cancelled, but products in transit that have been shipped before the approval of the new registration number will not be affected, and the original registration number can be used for import declaration. |
| **19** | **Registration / Correction / Amendments**  **注册/变更/修改** | For several registrations in CIFER some products (HS codes) are missing, despite the establishments confirm that these products were exported to China in the past and are still being exported;  What is the correct procedure to have the missing HS codes added to their registrations? Will GACC need supporting documents?  在进口食品境外生产企业注册系统的几个注册中，有些产品（HS编码）是缺失的，尽管企业确认这些产品在过去曾出口到中国，并且仍在出口。  正确的程序是什么，以便将缺失的HS编码加入其注册中？海关总署是否需要证明文件？ | 企业如需增加新产品（HS编码）注册，可登陆注册系统，按变更程序进行申请。  If enterprises need to add registration of new products (HS code), they can log in to the registration system and apply for a modification according to relevant procedures. |
| **20** | **Registration / Correction / Amendments**  **注册/变更/修改** | If an establishment changes its name, can the GACC confirm that the name should be corrected via an application for modification?  Which specific documentation is required for this modification?​  如果一个机构改变了名称，海关总署是否可以确认通过申请修改来更正名称？  这种修改需要哪些具体文件？ | 企业名称发生变更的，可登录注册系统，按变更程序进行申请。  If an establishment changes its name, it can log in to the registration system and apply for a modification according to relevant procedures. |
| **21** | **Registration / Correction / Amendments**  **注册/变更/修改** | Sometimes there are mistakes in the establishments' addresses, e.g. due to incorrect registration/transfer of registration information to CIFER or due to a change of the street name. Many addresses were transferred incorrectly to CIFER from former AQSIQ lists – for example all addresses of casings establishments appear to be wrong. But the actual location of the establishment remained unchanged. It is not possible to correct the address in CIFER via an application for modification, only via an application for registration.A simpler procedure is needed for these situations.  The explanation from the GACC as noted in "customs feedback" field may read “The system does not support modifying the company address, and a letter is required to explain the situation".  Should such letter be uploaded in CIFER, and if yes, where in the application? Who should write the letter (the competent authority or the establishment)?  Could GACC provide for a fast and efficient procedure to correct addresses in the event of clerical error?  If an application for registration is really required in these cases, will the GACC ensure that the export is not disrupted until the application for registration is approved?  有时，机构的地址会出现错误，例如，由于注册/转入进口食品境外生产企业注册系统的注册信息不正确或由于街道名称的改变。许多地址从之前质检总局的名单中转移到进口食品境外生产企业注册系统时出现错误。例如：所有肠衣企业的地址似乎都是错误的。但机构的实际位置却没有改变。不可能通过修改申请来更正进口食品境外生产企业注册系统中的地址，只能通过注册申请。对于这些情况，需要一个更简单的程序。  海关总署在“海关反馈”栏中的解释，可能是 “*系统不支持修改公司地址，需写信解释该情况*”。  此类信函是否应该上传到进口食品境外生产企业注册系统中，如果是，在申请的什么地方？谁应该写这封信（主管当局或机构）？  海关总署能否提供一个快速有效的程序，以处理出现文书错误时进行地址更正？  如果在这些情况下确实需要申请注册，海关总署能否确保在注册申请被批准之前出口不会中断？ | 请提供地址错误的企业在华注册编号及正确的企业地址信息，中方将会对信息进行核实。如是中方批量导入系统时发生的错误，中方将进行修改；如是企业发生了地址的变更（不涉及物理地址的变化），请主管部门来函说明情况，中方将根据来函进行修改。  Please provide the registration number of the enterprise with the wrong registered address in China and its correct address information The Chinese side will verify the information.  If there was an error when the Chinese side transferred information to the system in batches, the Chinese side will make modifications. If the enterprise has changed its address (unrelated to a change of the physical address), the competent authority is requested to send an explanatory letter/ The Chinese side will make modifications in accordance with the letter. |
| **22** | **Registration / Correction / Amendments**  **注册/变更/修改** | If an establishment really does move its production to a new address, a new application is requested.  Can GACC clarify if a new account must be applied for in this case too?  如果一个机构真的将其生产转移到一个新地址，其需要提交新的申请。  海关总署能否说明在这种情况下是否也必须申请一个新账户？ | 根据248号令及其释义，如果企业生产场所迁址（物理地址变更）、法定代表人变更或是所在国家（地区）授予的注册编号改变等，相关企业不应按照变更的方式申请调整相关注册事项，而是应通过符合本规定要求的相应申请途径，提交新的注册申请及申请材料。新的注册申请通过后，原有在华注册编号将自动失效，原有注册资格被注销。  In accordance with Decree 248 as well as with its interpretation, any change in the address of the production site, legal representative, or registration number granted by a country or region, the relevant establishment cannot apply for adjustments following the modification procedures. Instead, a registration application with documentation has to be filled anew through the corresponding application channels that meet the requirements of this Regulation. After approval of the new registration application, the previous Chinese registration number in China will automatically become invalid and the previous registration qualification cancelled. |
| **23** | **Registration / Correction / Amendments**  **注册/变更/修改** | It is impossible in CIFER to correct erroneous entries of data because several fields are excluded from the possibility of self-correction. Each time such cases require an intervention of the administration or even the Embassy in Beijing.  CAGG should consider allowing correction of all fields in CIFER by the applicant.  在进口食品境外生产企业注册系统中无法更正数据的录入错误，因为有许多内容无法自动更正。每次这种情况都需要行政部门甚至是驻北京的大使馆介入  海关总署应该考虑允许申请人对进口食品境外生产企业注册系统中的所有内容进行更正。 | 企业信息发生变更的，可登陆注册系统，按变更程序进行申请。  If there are changes in enterprise information, the enterprise can log in to the registration system and apply for modifications according to relevant procedures. |
| **24** | **Registration / Correction / Amendments**  **注册/变更/修改** | When GACC registered establishments for aquatic products they were registered with a long list of HS codes. Now, for the renewal, plants propose only the HS codes of the products actually exported.  CIFER produces the the error message: “HsCiqCode: xxxx has been updated, please reselect it!” The HS/CIQ codes mentioned in the error message are those that were transferred to the establishments’ registrations in CIFER.  Now the applicant must delete all the irrelevant codes before he can submit the application to the GACC, which is very time consuming for the establishments since there is no search-function in the system. Some establishments have to look through more than 2500 HS/CIQ codes to find the HS/CIQ codes mentioned.  Could GACC consider this situation and accept the registration demand with only the HS codes of products actually exported?  Is there a better way to delete the relevant HS codes?  ***New:***  ***More specific answers to each of the specific questions still welcome***  海关总署为水产品注册机构时，其注册的是一长串的HS编码。现在，更新时，工厂只有实际出口产品的HS编码。  系统会生成错误信息：“*HsCiqCode: xxxx已被更新，请重新选择！*” 错误信息中提到的HS/CIQ编码是那些被转移到进口食品境外生产企业注册系统中的机构注册的编码。  现在，申请人必须在向海关总署提交申请前删除所有不相关的编码，这对机构来说非常耗时，因为系统中没有搜索功能。一些机构必须翻阅2500多个HS/CIQ编码才能找到涉及的HS/CIQ编码。  海关总署能否考虑这种情况，只接受实际涉及出口产品的HS编码的注册要求？  是否有更好的方法来删除相关的HS编码？ |  |

**Questions related to self-registration (Article 9)**

**有关自行注册的问题（第九条）**

|  |  |  |  |
| --- | --- | --- | --- |
| **Question No** | **General topic 整体问题** | **Question by EU 欧盟的问题** | **Response by GACC海关总署的答复** |
| **25** | **Registration / Procedure**  **注册/程序** | Some companies still face difficulties with complex registrations for spirits or wine. This is the case when products are exported from one country in bulk and bottled in another country and shipped from there to China. For example, a product may be imported from country A to country B in bulk and bottled in country B *but still originated from country A from a custom perspective.*  Could GACC confirm that the registered production site should be the bottling site exporting the product to China (i.e. country B), even if the accompanying certificate of origin features a different country (country A) as country of origin?  ***New:***  ***Double registration in both country A and country B is not a practical option. However a solution is still needed to address the above situation without disrupting trade***  一些公司在烈酒或葡萄酒的复杂注册方面仍然面临着困难。当产品从一个国家散装出口，在另一个国家装瓶并从那里运往中国时，就会出现这种情况。例如，产品可能从A国散装进口到B国，并在B国装瓶，*但从海关的角度来看，产品仍然来自A国*。  海关总署能否确认，注册的生产地应该是向中国出口产品的装瓶地（即B国），即使随附的原产地证书以不同的国家（A国）为原产地？ | 酒类产品无法正常进口到中国的关键问题是：按照国际通行的酒类产品原产地认定的相关要求，B国无法为该产品出具B国的原产地证书。目前，注册地与原产地在申报中会进行校验，建议企业间通过委托加工等商业方式协商解决或者要求A国酒类生产企业同时申请在华注册。  The key problem for the failure to import alcohol products into China is that according to the relevant requirements for the identification of the origin of alcohol products, is when country B cannot issue the certificate of origin of country B for the product.  At present, the place of registration and the place of origin will be verified in the declaration. It is recommended that the enterprises negotiate with each other through entrusted processing and other commercial means or require the alcohol production enterprises of country A to apply for registration in China at the same time.  **When both the production site and the bottling site are registered, it is possible for the EU operator to choose and indicate one or the other of the registration numbers**  **当生产地点和装瓶地点均已注册时，欧盟经营者可以选择并注明其中一个注册号。** |
| **26** | **Registration / Procedure**  **注册/程序** | Wine exporters regret the inability to enter more than one format (e.g., one can register either only bottles up to two liters or only bottles over two liters capacity).  Could GACC allow for more flexibility in the entry of container sizes?  葡萄酒出口商对无法输入一种以上的格式感到遗憾（例如：既可以注册两升以下容量的瓶子，也可以注册两升以上容量的瓶子）。  海关总署能否允许在输入容器容量方面有更大的灵活性？ | 葡萄酒的容量要求是根据商品税则归类要求决定的，企业需要选择产品所对应的商品编码，一家酒类企业可以在一次注册过程中同时选择多个商品编码。  The capacity requirement of wine is determined according to the tariff classification requirements for commodities. Enterprises need to select the corresponding commodity code of the product. A liquor/wine enterprise can select multiple commodity codes at the same time in the process of registration. |
| **27** | **Registration / Procedure**  **注册/程序** | "Customs feedback" messages in CIFER are in Chinese. It is a challenge for the establishments and the authorities to understand the feedback from GACC on the applications.  Would it be possible to provide feedback in English language?  进口食品境外生产企业注册系统中的“海关反馈”信息是中文的。对于机构和当局来说，要理解海关总署对申请的反馈是一个挑战。  是否有可能用英语提供反馈？ | 中方已要求专家反馈中英双语的评审意见。  The Chinese side has asked experts to give feedback in both Chinese and English. |
| **28** | **Registration / Procedure**  **注册/程序** | Also the "Declaration for the extension of registration of manufacturer" (Annex 16) is only available in Chinese in CIFER.  Would it be possible to provide the Declaration in English language?  另外，“生产企业延续注册声明”（附件16）在进口食品境外生产企业注册系统中只有中文版本。  是否有可能提供英文版本的声明？ | 中方将核实，尽快提供相关文件英文版。  The Chinese side will verify and provide relevant documents in English as soon as possible. |
| **29** | **Registration / Procedure**  **注册/程序** | Difficulty in adding multiple locations for a single company.  无法为一个公司增加多个地址。 | 不同地址的企业，应分别申请注册。  Enterprises with different addresses should apply for registration separately. |
| **30** | **Registration / Procedure**  **注册/程序** | A new functionality has been added a few months ago to the CIFER platform, named ‘account certification”.  We understand that this functionality is dedicated to the Article 7 products' registration procedure (registration with recommendation). However, the ‘account certification’ function is available also under the self-registration procedure and may be triggered by accident. This causes unnecessary administrative problems.  Would it be possible to ensure that the functionality “account certification” is only available for registrations with recommendation under Article 7?  ***New:***  ***It is still to be confirmed that the functionality “account certification” is restricted to article 7 establishments. Registrations should remain valid and trade should not be disrupted for article 9 establishments because of the functionality “account certification”***  几个月前，进口食品境外生产企业注册系统平台增加了一项名为 “账户认证”的新功能。  据我们了解，该功能专门用于第七条产品的注册程序（推荐注册）。然而，“账户认证”功能在自行注册程序中也可以使用，并且可能会被意外触发。这造成了不必要的行政问题。  是否有可能确保“账户认证”功能仅适用于第七条下的推荐注册？ | 根据企业使用中的需求，系统进行了优化。未认证的账号仅可以办理18类以外食品的企业注册、变更、延续、注销、复查、整改，以及各类查询。经认证的账号可以办理所有类别食品的企业注册、变更、延续、注销、复查、整改，以及各类查询。  “账户认证”只能在办理18类以内的产品时使用，在办理18类以外产品时并不能使用，不会发生被意外触发的情况，如有被意外触发的情况请欧方提供具体操作页面截图等资料，以便中方核实。  The system has been optimized according to usage demands of enterprises. Uncertified accounts can only handle the registration, modification, renewal, cancellation, re-examination, rectification and various inquiries of enterprises other than 18 food categories. Certified accounts can handle registration, modification, renewal, cancellation, re-examination, rectification and various inquiries of the enterprise for all kinds of food.  “Account certification” can only be used when handling products from the 18 categories. It cannot be used when handling products beyond the 18 categories. It will not be triggered by accident. If it is triggered by accident, please provide the screenshot of the specific operation pages and other information to the Chinese side for verification.  **GACC confirms that there should be no suspension of self-registration (article 9) because of an accidental use of the “account certification” function foreseen for authority registration (article 7)**  **海关总署确认不因误用主管当局推荐注册（第七条）项下的“账户认证”功能而暂停自主注册（第九条）。** |
| **31** | **Registration / Correction / Amendments**  **注册/变更/修改** | Companies which use the self-registration route face difficulties on a regular basis when modifying their registration.  When a registration is modified, usually to add low-risk products to the existing list of products, the registration often gets suspended, with a request for corrections to fields that had already been approved. The reason for these requested corrections is often unclear, and companies often do not know what they are expected to do.  Could GACC confirm that an existing registration remains valid while GACC reviews any requested changes?  Could GACC ensure that elements that are unchanged and were previously approved remain valid in the system, if not they are not modified by the applicant?  ***New:***  ***Modification of article 9 registrations is still burdensome – registrations should remain valid and trade should not be disrupted for article 9 establishments during the modification process***  使用自行注册途径的公司在修改其注册时经常遇到问题。  当修改注册时，通常是在现有的产品清单中增加低风险产品，注册经常被暂停，并要求对已经批准的内容进行更正。这些要求更正的原因不明确，公司往往不知道他们该做什么。  海关总署能否确认，在其审查任何申请修改时，现有注册仍然有效？  海关总署能否确保那些未变更的及之前已批准的内容在系统中仍然有效，如果不是这样，它们不会被申请人修改？ | 已注册企业可以在注册系统中申请新增/变更产品，注册系统会根据企业注册/变更产品的时间确定有效期，企业申请新增产品时，不会对已注册的产品造成影响。  Registered enterprises can apply for new/modified products in the registration system. The registration system will determine the validity period according to the time when the enterprise registers/modifies the products. When the enterprise applies for new products, already registered products will not be affected.  **GACC welcomes concrete examples of problems (screenshots) faced with modifications or corrections of self-registration (article 9).**  **E-mail contact is**  [**shipinjusanchu@customs.gov.cn**](mailto:shipinjusanchu@customs.gov.cn)  **海关总署欢迎提供修改或更正自主注册（第 9 条）所面临问题的具体示例（截图）。**  **电子邮件联系方式是**  [**shipinjusanchu@customs.gov.cn**](mailto:shipinjusanchu@customs.gov.cn) |
| **32** | **Registration / Correction / Amendments**  **注册/变更/修改** | Difficulty/impossibility of changing master data within the profile of the company registered on the platform.  CAGG should consider allowing correction of all fields in CIFER by the applicant.  无法更改在平台上注册的公司简介内的主数据。  海关总署应考虑允许申请人对进口食品境外生产企业注册系统中的所有内容进行修改。 | 业务办理流转到不同的环节，可操作的人员不同。注册、变更、延续、注销、复查、整改的反馈，企业（申请人）在提交到主管当局或提交海关之前企业可以修改；主管当局退回企业补齐补正、海关退回企业补齐补正后，企业也可以修改。  如果提交到主管当局后，只有主管当局可以修改。  如果提交到中国海关，只有中国海关可以修改。  不管业务流转到哪个环节，企业、主管当局都可以看到业务办理的情况。  请欧方提供具体的数据信息，中方将评估后予以解答。  Different operators handle different phases of business processing. The enterprise (applicant) can modify the feedback of registration, modification, renewal, cancellation, re-examination and rectification before submitting it to the competent authority or customs. After the competent or Customs authority or returns the enterprise for supplement and correction, the enterprise can also make modifications.  If submitted to the competent authority, only the competent authority can modify it.  If submitted to the Chinese Customs, only the Chinese Customs can modify it.  No matter which phase of the business processing is in, enterprises and competent authorities can check the business processing.  The European side is requested to provide specific data and information. The Chinese side will give an answer after evaluation. |
| **33** | **Registration / Correction / Amendments**  **注册/变更/修改** | Several registered companies have had their name changed automatically by the CIFER system (without having tried to modify it in any way). The company name was automatically replaced by the name of the country, region or city of production. Some companies had their registration suspended with a request to correct this.  In several cases, data uploaded into CIFER were lost and had to be re-entered.  Could GACC address these technical issues to ensure it does not happen again?  有几家注册公司的名称在进口食品境外生产企业注册系统中自动更改了（在未尝试任何方式修改的情况下）。公司名被自动替换为国家、地区或生产城市的名称。一些公司的注册则被暂停，并被要求纠正。  在一些情况下，上传到进口食品境外生产企业注册系统的数据丢失，不得不重新输入。  海关总署能否解决这些技术问题以确保不再发生该情况 | 请欧方提供具体的数据信息，中方将评估后予以解答。  The European side is requested to provide specific data and information. The Chinese side will give an answer after evaluation. |
| **34** | **Registration / Procedure**  **注册/程序** | EU Member States are still facing a lot of technical issues and problems with CIFER and would welcome a training on CIFER.  欧盟成员国在进口食品境外生产企业注册系统方面仍然面临着很多技术问题和难题，并欢迎针对该系统进行培训。 | 中方愿就注册事宜与欧方进行沟通，解答注册过程中遇到的困惑，保障中欧食品贸易顺畅，保证进口食品安全。  We are willing to communicate with the European side on registration issues, answer questions encountered in the registration process, ensure the smooth trade of food related products between China and Europe, and ensure the safety of imported food.  **Overall, GACC will explore technically where in the system improvements can be achieved.**  **总的来说，海关总署将在技术上探索系统改进的地方。** |