

Standards and compliance for EU exports to China

Dr. Martina Gerst

Founder, Innovation Space

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Camera di Commercio Italiana in Cina
中国意大利商会
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Implementing partners



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中国欧盟商会



Dr. Martina Gerst LL.M – Innovation Space



- Technical Adviser/Trainer for Market Access China
- Dr. Gerst has more than 15 years of China experience. During this time, she has advised EU SMEs about market access to China, especially standards & conformity, and IPR, in different sectors such as F&B, Electric/Electronics, ICT/e-commerce, or automotive. In addition, she has participated in R&D projects about mechanical engineering and ICT.
- Dr. Gerst has held senior positions in Fortune 500 companies such as BMW, Daimler, Siemens, KPMG.
- eMail: mgerst@innovation-space.com

Content

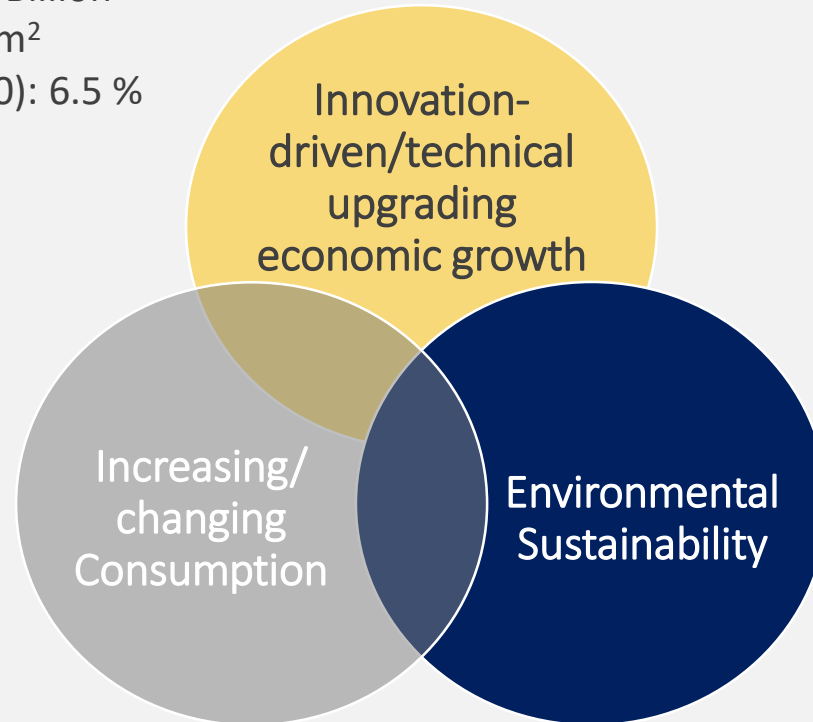
- **The China Market**
 - Current Trends and related Opportunities
 - Some practical Tips and First Steps
- **Exporting to China – How to access the market**
 - Market Entry and Access requirements
 - China Cross-Border E-Commerce (CBEC)
- **Summary**

Content

- **The China Market**
 - Current Trends and related Opportunities
 - Some practical Tips and First Steps

The Chinese Market is continuously changing – Current Trends & Opportunities

- Population (2019): 1.4 Billion+
- Territory: 9.6 Million km²
- GDP Growth rate (2020): 6.5 %



F&B



E/M-Commerce



Healthcare



Automated Machine Tools and Robotics



Construction & Green Building



Green Tech and Green Transportation



R&D and Innovation



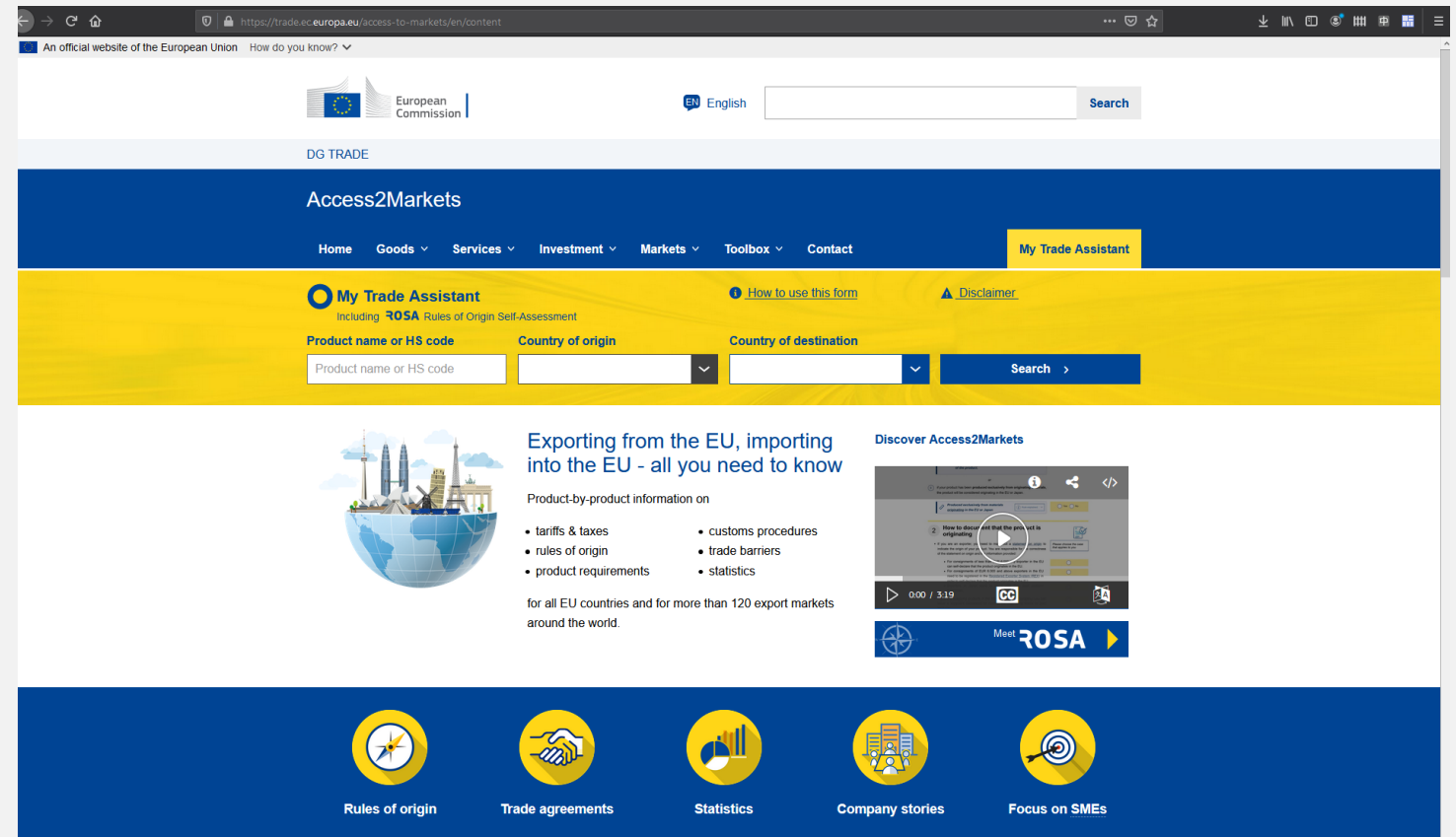
Service Sector

Practical Tips – First Steps and how to start

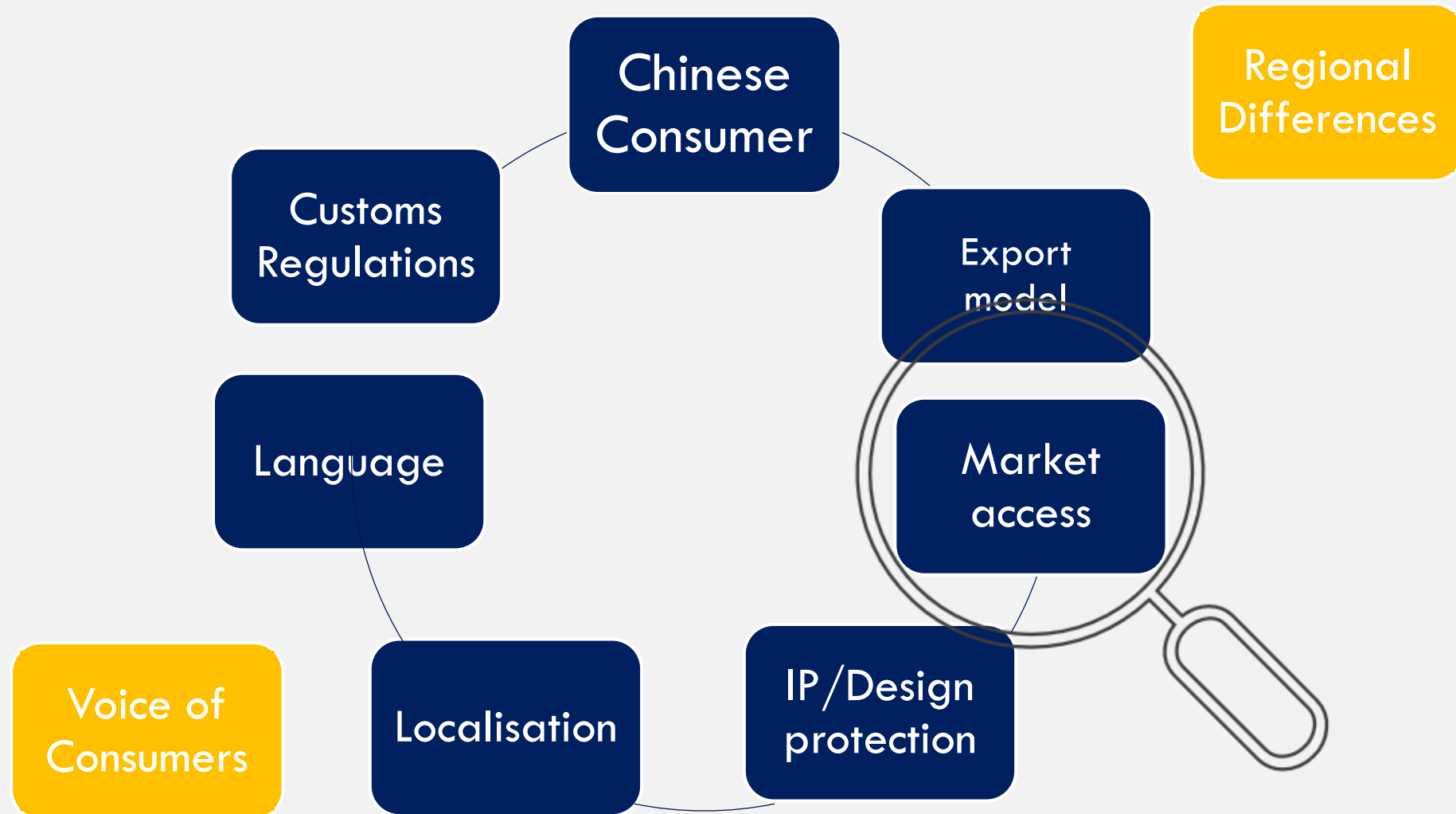
- EU SME Centre
 - Diagnostic Kit
 - 80+ FAQs
 - 4 basic publications
 - Is China on your radar?
 - Knowing your partners
 - Ways to enter the Chinese Market
 - Exporting goods, services, technology to the China Market



- The EC Market Access Database/A2M is a useful tool
- <https://trade.ec.europa.eu/access-to-markets/en/content>



Key Points to consider



Exporting to China – How to access the market

- Market Entry and Access requirements

Export to China – Different models

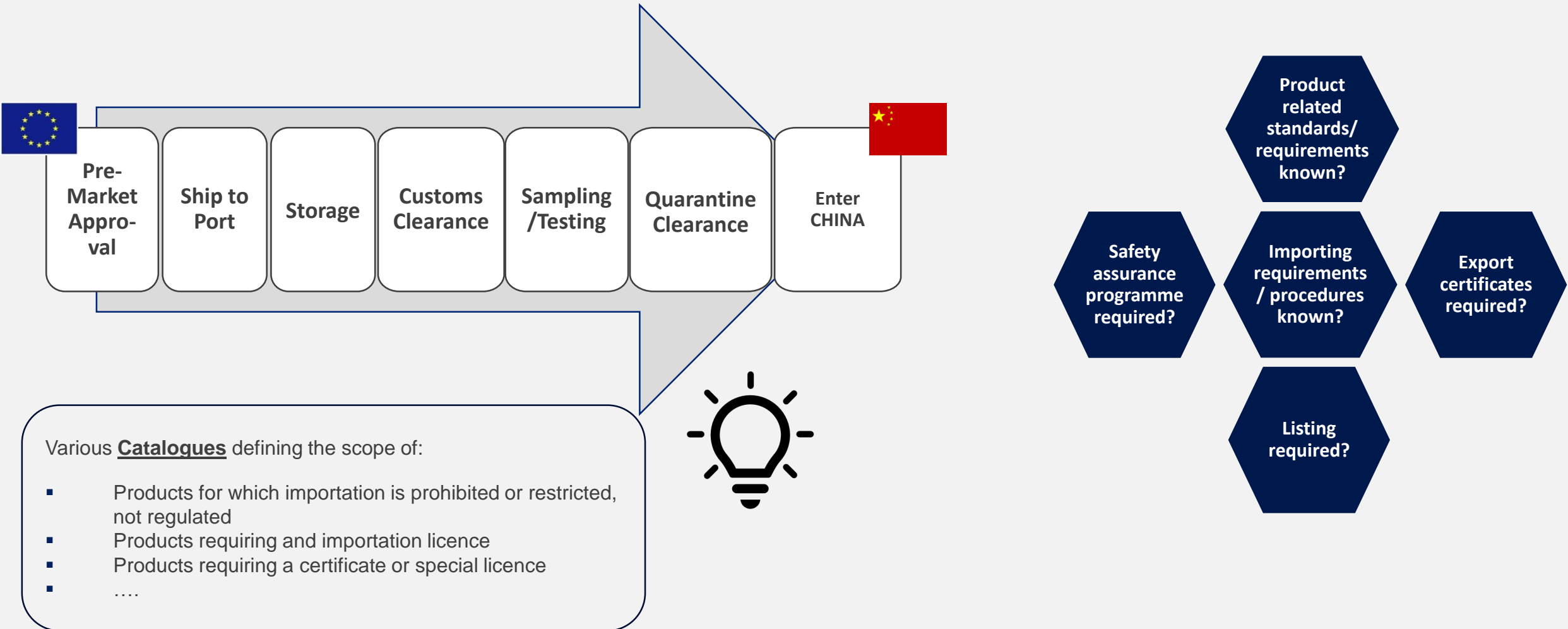
Classic Exporting

- General trade with related regulation
- General Warehousing/fulfilment
- Revenue received on a local Chinese bank account
- Fapiao (official purchase invoice) can be provided

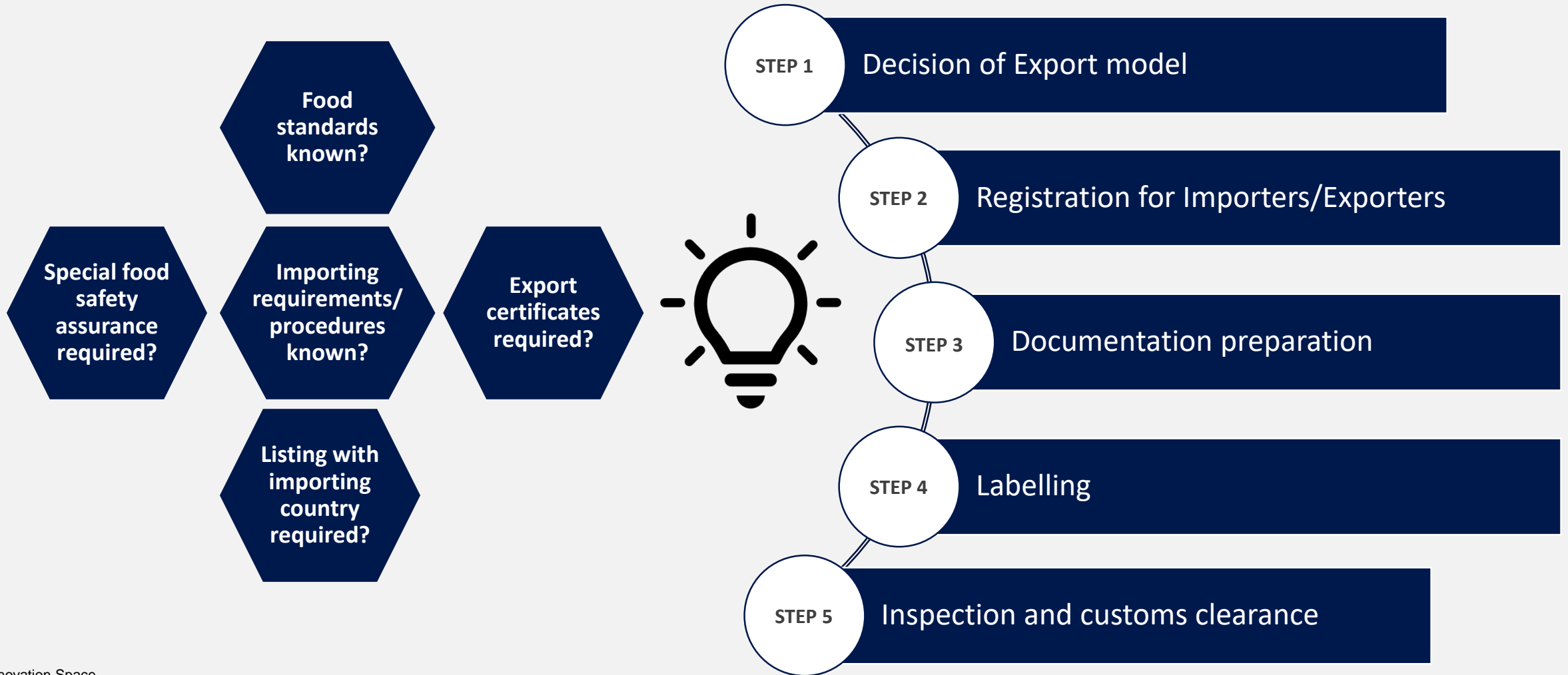
Cross Border E-Commerce (CBEC)

- Bonded Imports (B2B2C)
- Direct Purchase Imports (B2C)
- Direct Mailing Imports (C2C)

Exporting to China – Market Access Requirements



F&B – What you need to know step-by-step



F&B – Pre-packed foodstuff



Examples

HS code

- 1704 Confectionery
- 1902 Pasta
- 1905 Pastry, biscuits
- 2203 Beer

- Food Safety Law
- Entry/Exit Quarantine China
- Administrative measures of Import Export for Food Safety
- Overseas manufacturer registration of imported food
- Importer/Exporter Record
- Advertising Law



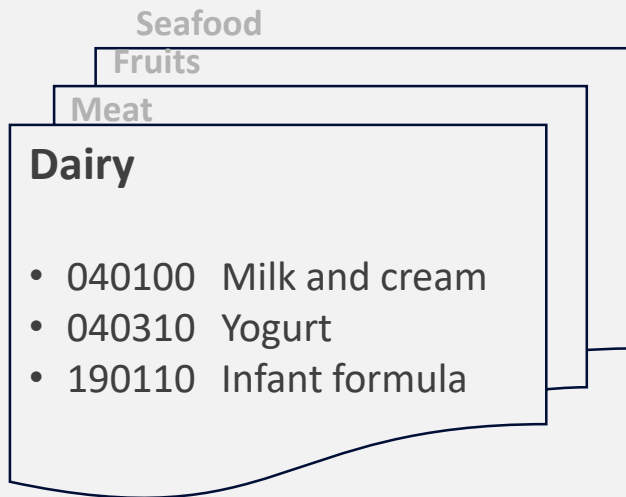
Sources

- Your local Chamber of Commerce, Trade associations
- AQSIQ database: <https://ire.eciq.net/>
- China Customs: <http://online.customs.gov.cn/>

Steps	To Do's
Export model	<ul style="list-style-type: none"> • Both (CBEC: check positive list)
Standards	<ul style="list-style-type: none"> • General hygienic regulation for food production GB14881-2013 • Standards for Uses of Additives in Food Contact Materials and Products, GB-9865-2016 • General safety requirements of Food Contact Materials and Articles GB 4806.1-2016 • The Usage of Food Additives GB 2760-2014, etc. • Packaging standards GB 4806.1-2016 Standard on General Safety Requirements for Food-contact Materials and Articles
Registration	<ul style="list-style-type: none"> • EU companies and Importers required to register (http://ire.customs.gov.cn/)
Labelling	<ul style="list-style-type: none"> • General Rules of the Labelling of Pre-packaged Food GB 7718-2011 • General Rules for the Nutrition Labelling of Pre-packaged Foods GB 28050-2011
Inspection/Customs	<ul style="list-style-type: none"> • Importer and Label filing at CIQ • Inspection to receive Sanitary Certificate



F&B – Dairy



- Food Safety Law
-
- Bi-lateral agreements and shared health certificates

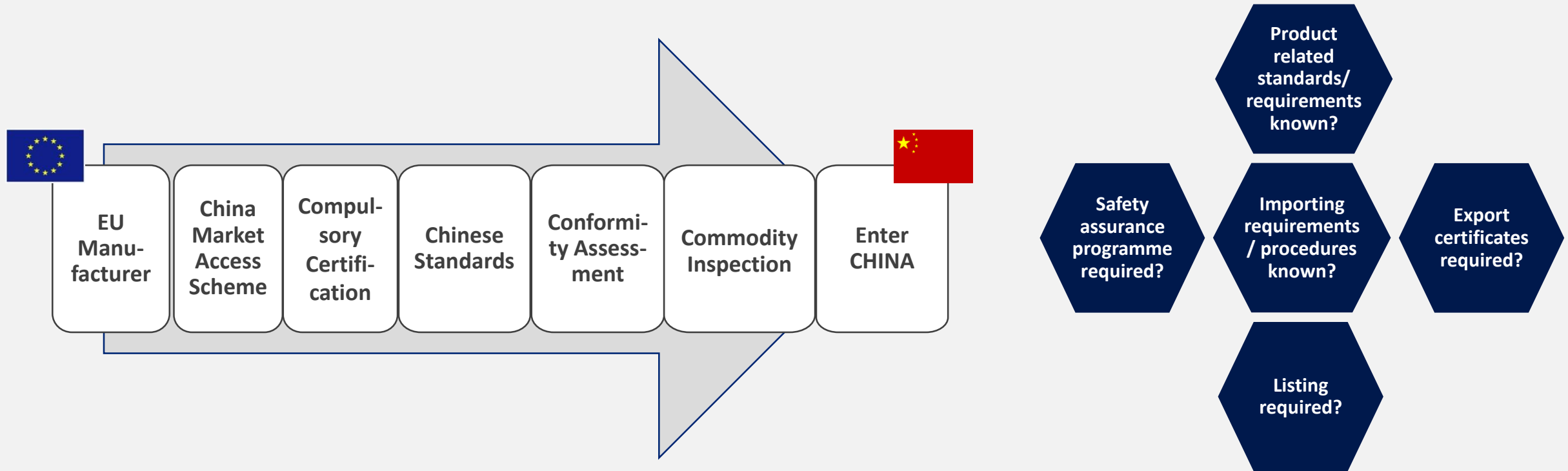
Steps	To Do's
Export model	<ul style="list-style-type: none"> • Both (CBEC: check positive list)
Standards	<ul style="list-style-type: none"> • Sterilised milk GB 25190-2010 • Pasteurised milk GB 19645-2010 • Infant formula GB 10765-2010, etc.
Registration	<ul style="list-style-type: none"> • Country protocol and sanitary certificate required • EU companies and Importers required to register (http://ire.customs.gov.cn/) • Registration of foreign plants producing dairy
Labelling	<ul style="list-style-type: none"> • General Rules of the Labelling of Pre-packaged Food GB 7718-2011 • National Standards for the Usage of Food Additives GB 2760-2011 • General Rules for the Nutrition Labelling of Pre-packaged Foods GB 28050-2011
Inspection/Customs	<ul style="list-style-type: none"> • CIQ and customs inspection



Sources

- Your local Chamber of Commerce, Trade associations
- Documentation overview at EU market access database: <https://trade.ec.europa.eu/access-to-markets/en/content/welcome-access2markets-market-access-database-users>
- EU SME Centre's Guidelines and reports for Dairy, CBEC, etc.: www.eusmecentre.org.cn
- GACC: Dairy products, <http://jckspj.customs.gov.cn/spj/zwgk75/2706880/2811812/jkrpiwscqyzcmd3/index.html>

Consumer products – Market Access and Requirements



Consumer products – Step-by-Step to Compliance

- 1 Does the product fall under a catalogue?
- 2 Does the product fall under the scope of the **Product Safety Law**?
- 3 Do any compulsory certifications, licensing, labeling schemes apply?
- 4 What compulsory and voluntary standards do apply?
- 5 What tests are required?
- 6 Is there any voluntary certification and labelling scheme?
- 7 Is the product documentation compliant with regulations?



Product Safety Law

Cosmetics



Examples

- Special Cosmetic products, e.g. hair dye
- General Cosmetic products, e.g. Skincare

- Product Safety Law
- Regulations on Supervision and Administration of Cosmetics („New Regulations“, effective Jan.2021 replacing the previous Regulations on the Hygiene Supervision of Cosmetics

Steps	To Do's
Export model	<ul style="list-style-type: none"> • Both, check positive list
Standards	<ul style="list-style-type: none"> • Existing Cosmetic Ingredients in China (IECIC 2015) • Hygiene Standard for Cosmetics 2007 lists the restrictions for ingredients • General Labelling for Cosmetics GB 5296.3-2008
Filing/Registration	<ul style="list-style-type: none"> • Filing with NMPA/local MPAs by authorised person • Authorised person responsible for import, quality and safety • Registration/technical evaluation of special-use cosmetics with/by NMPA
Labelling	<ul style="list-style-type: none"> • All imported cosmetics requires Chinese label • Cosmetic relevant Administrative measures updated
Inspection/Customs	<ul style="list-style-type: none"> • Import port of China authorised person location • All certificates required for customs clearance

Sources

- Your local Chamber of Commerce, Trade associations
- Cosmetic Europe: <https://cosmeticseurope.eu/>
- China State Council „New Regulations“: http://www.gov.cn/zhengce/content/2020-06/29/content_5522593.htm
- EU SME Centre's Cosmetic Guidelines and reports: www.eusmecentre.org.cn



Other Consumer products



Examples

- Electric tools
- Household products
- Toys
- Low voltage systems
- Decoration and adaptation equipment
- Safety glass
- ...

- Product Safety Law
- SAMR/MIIT „Arrangement for Implementing the Conformity Assessment System of the Restricted Use of Hazardous Substances in Electrical and Electronic Products.” RoHS Catalogue
- China Quality Certification Centre (CQC)

Steps	To Do's
Export model	<ul style="list-style-type: none"> • Both (for CBEC, check positive list)
Standards	<ul style="list-style-type: none"> • Product Safety, e.g. toys: GB 6675-2014 • EMC • Energy Efficiency
Certification Schemes	<ul style="list-style-type: none"> • CCC: mandatory • RoHS: voluntary/self-declaration for 12 product categories (e.g. refrigerator,s, electric water heaters, printers, etc.)
Labelling	<ul style="list-style-type: none"> • CCC mark • RoHS, EMC, etc.
Inspection/Customs	<ul style="list-style-type: none"> • Customs clearance

Sources

- Your local Chamber of Commerce, Trade associations
- DIN portal, Toys: http://cn-e.standards-portal.de/web_en/search?filter=toy&site=all
- [China National standards \(EN\): http://www.gbstandards.org/index/Standards_Search.asp?word=source](http://www.gbstandards.org/index/Standards_Search.asp?word=source)
- EU-China Standardization Info Platform: <https://webgate.ec.europa.eu/cesip/#navSearch>

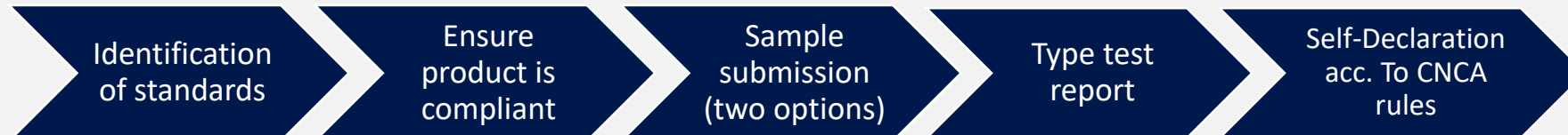


Consumer products – China Compulsory Certification (CCC)

CCC standard procedure



CCC Self-declaration



Sources

- EU SME Centre CCC Guideline: <https://www.eusmecentre.org.cn/article/updated-guidelines-china-compulsory-certification-ccc-scheme>

Exporting to China – How to access the market

- China Cross-Border E-Commerce (CBEC)

Export to China – How to access the market- different models

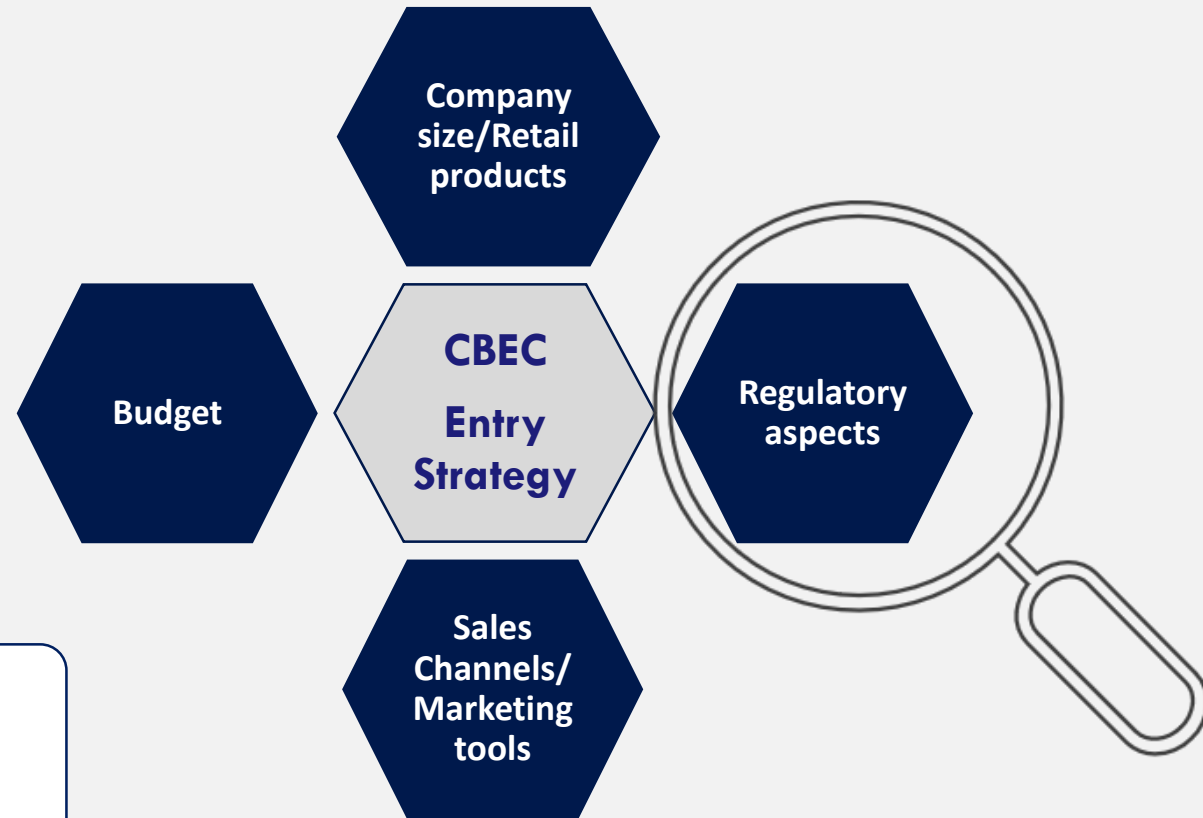
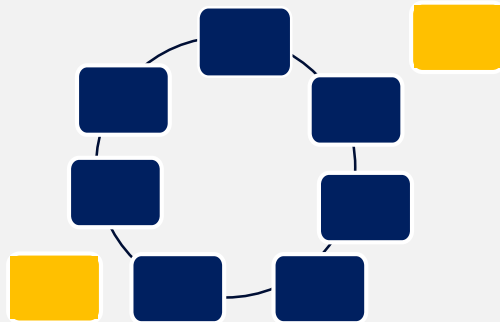
Classic Exporting

- General trade with related regulation
- General Warehousing/fulfilment
- Revenue received on a local Chinese bank account
- Fapiao

Cross Border E-Commerce (CBEC)

- Bonded Imports (B2B2C)
 - Bonded warehouse as secured area with special customs supervision
 - Simplified and faster product registration will apply,
 - No local Chinese business entity is required.
- Direct Purchase Imports (B2C)
 - Managed under the bonded import and direct purchase imports clearance
 - Bonded warehouse used as a hub with different customs supervision
 - Individual parcels packed and labelled overseas
- Direct Mailing Imports (C2C)
 - Ordered abroad directly by customers
 - VAT and customs paid by customer


CBEC – What to consider



CBEC platform/service providers

- Registered
- Logistics/Customs resp.
- Etc.

CBEC – Regulatory Aspects

CBEC Import Model	Zones/Customs Clearance	CBEC Retail Import policies impact	Best Practice 
Bonded Imports	Pilot cities, 1210	<ul style="list-style-type: none"> • Products to be considered as „personal use“ • Quarantine procedures to be executed if applicable • No licensing, registration/filing requirements for ‚First-time‘ imported goods • Products have to be the same than sold in the local EU market (> 1 year) • Check Ingredients if prohibited in China 	<ul style="list-style-type: none"> • Communication with CBEC platform • Check positive list (HS code) • Check regulatory requirements in detail per product with pilot city or GACC • Check E-commerce platform rules, e.g. Alibaba T-Mall(in Chinese) (https://rule.tmall.hk/rule/rule_detail.htm?spm=0.0.0.0.hp6dLY&id=11002957&tag=self) • Information of Chinese customers
	Other cities, 1239	<ul style="list-style-type: none"> • Entry of products regulated as classic import, including quarantine and inspection • Same licensing, registration/filing, labelling requirements as classic imports • Cosmetics, medical devices, pharmaceutical products are regulated by NMPA • Infant formula, health food, food for special medical purposes regulated by SAMR 	
Direct Purchase Imports	9610	<ul style="list-style-type: none"> • Products to be considered as „personal use“ • No licensing, registration/filing requirements for First-time imported goods • Products have to be the same than sold in the local EU market (> 1 year) • Ingredients to be checked if prohibited in China • Random spot checks of quarantine procedures (if applicable) 	

Summary

1. Talk to as many people as possible to get familiar with the key elements of exporting to China
2. Be ready to adapt business strategy and risk management
3. Exporting to China requires expertise on the ground in China

Useful links


- **EU-China Standardization Info Platform:** <https://webgate.ec.europa.eu/cesip/>
- **EU Commission DB Access2Markets:** <https://trade.ec.europa.eu/access-to-markets/en/content>
- **E-to-China.com:** <https://hs.e-to-china.com>
- **European customs portal:** <https://www.tariffnumber.com/2020>
- **General Administration of Customs PRC (GACC):** <http://english.customs.gov.cn/>
- **Positive list CBEC (2019 in Chinese):**
<http://cws.mofcom.gov.cn/article/swcjzc/202001/20200102929369.shtml>
- **Unofficial translation of positive list can be provided by the EU SME Centre upon request**



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Thank You!

 info@eusmecentre.org.cn

 +86 (10) 8523 6098

 www.eusmecentre.org.cn

