

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

General topic 整体问题	Question by EU 欧盟的问题	Response by GACC 海关总署的答复
GACC Contact Point 海关总署联系方式	<p>The availability of GACC to resolve pending registration issues should be urgently enhanced.</p> <p>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?</p> <p>So far the following email is seen as GACC primary contact on Decree 248 shipinjuyichu@customs.gov.cn</p> <p>海关总署理应尽快提升效率解决未处理的注册问题。</p> <p>海关总署能否确认（或在有必要的情况下，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部门和欧盟企业的问题？</p>	

	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	
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 欧盟希望海关总署提供关于第 248 号令自 2022 年 1 月 1 日实施起，对主管部门和/或出口机构行业公告或指南的主要变化的最新情况/概述	
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) 欧盟希望海关总署提供自 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（在各种技术性升级后）的主要变化的最新情况/概述	

Questions related to authority registration (Article 7)

有关主管部门注册的问题（第七条）

General topic 整体问题	Question by EU 欧盟的问题	Response by GACC 海关总署的答复
--------------------	----------------------	--------------------------

<p>Registration / Product Categories / Scope 登记/ 产品类别/范围</p>	<p>By letter of 27 October 2022 GACC informed exporting countries that several product categories (mainly primary agricultural products) will be exempt from Decree 248.</p> <p>General questions: Could GACC specify the HS codes of the products exempted from Decree 248 further to GACC letter of end October 2022s?</p> <p>Could GACC clarify the registration procedure to be followed for product categories not covered anymore by Decree 248?</p> <p>Specific questions:</p> <p>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?</p> <p>Does the category ‘edible grains’ include oat flakes and flour?</p> <p>Will establishments producing edible fats and oils also be exempted?</p> <p>Will the registration through the Department of Animal and Plant Quarantine of GACC require a recommendation by the competent authority?</p> <p>What are the procedures foreseen for this registration?</p> <p>Can establishment register themselves or must this be done by the competent authority?</p> <p>If a registration must be done by e-mail to the Department of Animal and Plant Quarantine, should this</p>	
---	--	--

	<p>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?</p> <p>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。</p> <p>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？</p> <p>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？</p> <p>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部门的推荐？ 这种登记的程序是什么？企业可以自行登记，还是必须由主管部门完成？</p>	
--	---	--

	<p>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部门发送，还是由驻北京的大使馆发送？</p> <p>经动植物检疫局批准的机构名单将在哪里公布？如何更新？</p>	
<p>Registration / Product Categories / Scope 登记/ 产品类别/范围</p>	<p>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 and are exporters of edible grains not required to register under the Animal and Plant Quarantine Department?</p> <p>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？</p> <p>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是否不需要在动植物检疫部门登记？</p>	
<p>Registration / Product Categories / Scope 登记/ 产品类别/范围</p>	<p>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.</p> <p>When and how will GACC publish the registration of cold stores eligible for export of dairy products to China?</p>	

	<p>海关总署已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。</p> <p>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？</p>	
<p>Registration / Product Categories / Scope 登记/ 产品类别/范围</p>	<p>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.</p> <p>Could GACC inform competent authorities of exporting countries of updates of HS codes before they cause blockages?</p> <p>近期，海关总署在没有通知其他国家的条件下，对 HS 编码进行了一些更新，这对中国进口通关带来了很大干扰。</p> <p>海关总署能否在 HS 编码更新之前通知出口国的主管部门，以免造成堵塞？</p>	
<p>Registration renewals 延续注册</p>	<p>General questions:</p> <p>The EU would welcome clear guidelines from GACC on the procedure to follow and documentation required for registration renewals (Article 20)</p> <p>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.</p> <p>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.</p>	

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.**

一般性问题:

欧盟希望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。

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 CAGG 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.

具体问题：

对于那些注册资格将在 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。

<p>Registration / Supplementary Information 注册/补充资料</p>	<p>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 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。</p>	
<p>Registration / Procedure 注册/程序</p>	<p>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</p>	

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?

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？是否是指主管部门的代表？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）主管部门颁发的生产许可证”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，主管部门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？

	<p>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？</p>	
<p>Registration / Procedure 注册/程序</p>	<p>The instructions and explanations from the GACC as noted in "customs feedback" field are often difficult to interpret. Examples:</p> <ul style="list-style-type: none"> • <i>“There is no registration number in China, and the application type is wrong”</i>. 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. • <i>“Please add the name of the agency”</i>. The message refers to the field “Accredited agency”. As noted above, the interpretation of this field is unclear and instructions are missing. • <i>“Licensed production certificate issued by competent authority without official stamp”</i>. 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. • <i>“Due to system reasons, please fill in 1 for cooling capacity first.”</i> It is unclear 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.

在“海关反馈”一栏中海关总署的多数指示和解释难以理解。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

	<p>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。</p> <ul style="list-style-type: none">- “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。- “主管部门颁发的没有公章的生产许可证书”。主管部门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，并在纸上印有主管部门的标识。- “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	
--	--	--

	<p>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。</p>	
<p>Registration / Procedure 注册/程序</p>	<p>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.</p> <p>Can GACC address all issues concerning individual applications in one single feedback message?</p> <p>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。</p> <p>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？</p>	
<p>Registration / Procedure 注册/程序</p>	<p>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).</p> <p>When and how will GACC open the registration of establishments that are temporarily suspended?</p> <p>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）。</p>	

	<p>海关总署何时以及如何开放被暂停的机构的注册？</p>	
<p>Registration / Procedure 注册/程序</p>	<p>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).</p> <p>How can companies access accounts without a password?</p> <p>How can the Competent Authority manage these accounts?</p> <p>海关总署尚未向几家公司提供密码，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部门的 F 用户账户（账户管理）时也没有出现。</p> <p>公司如何在没有密码的情况下进入账户？</p> <p>主管部门如何管理这些账户？</p>	
<p>Registration / Procedure 注册/程序</p>	<p>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.</p> <p>Would it be possible for warehouses that all HS codes of a category are covered by default, or else that there is no</p>	

	<p>HS code requirement for warehouses and only a product category requirement?</p> <p>Warehouses wishing to apply for poultry renewal: Warehouses in Member States currently suspended because of avian influenza were not integrated into CIFER.</p> <p>GACC should not to block the registration of warehouses only because trade is temporally suspended.</p> <p>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。</p> <p>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？</p> <p>仓库希望申请更新家禽。目前因禽流感而暂停的成员国家仓库没有被纳入进口食品境外生产企业注册系统。</p> <p>海关总署不应仅仅因为贸易暂时中止而阻止仓库的注册。</p>	
<p>Registration / Correction / Amendments 注册/变更/修改</p>	<p>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.</p>	

	<p>Assignments of competent authorities should be changed by the competent authority.</p> <p>有时会出现将制造商错误地分配给各自的主管部门的情况。因此，主管部门不能完成注册程序所需的要求。 主管部门应能够变更分配。</p>	
<p>Registration / Correction / Amendments 注册/变更/修改</p>	<p>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?</p> <p>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？</p>	
<p>Registration / Correction / Amendments 注册/变更/修改</p>	<p>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;</p> <p>What is the correct procedure to have the missing HS codes added to their registrations? Will GACC need supporting documents?</p> <p>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。</p>	

	<p>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？</p>	
<p>Registration / Correction / Amendments 注册/变更/修改</p>	<p>If an establishment changes its name, can the GACC confirm that the name should be corrected via an application for modification?</p> <p>Which specific documentation is required for this modification?</p> <p>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？</p> <p>这种修改需要哪些具体文件？</p>	
<p>Registration / Correction / Amendments 注册/变更/修改</p>	<p>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.</p> <p>The explanation from the GACC as noted in "customs feedback" field may read <i>“The system does not support modifying the company address, and a letter is required to explain the situation”</i>.</p>	

	<p>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)?</p> <p>Could GACC provide for a fast and efficient procedure to correct addresses in the event of clerical error?</p> <p>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?</p> <p>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。</p> <p>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”。</p> <p>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（主管部门或机构）？</p>	
--	---	--

	<p>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？</p> <p>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？</p>	
<p>Registration / Correction / Amendments 注册/变更/修改</p>	<p>If an establishment really does move its production to a new address, a new application is requested.</p> <p>Can GACC clarify if a new account must be applied for in this case too?</p> <p>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。</p> <p>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？</p>	
<p>Registration / Correction / Amendments 注册/变更/修改</p>	<p>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.</p> <p>CAGG should consider allowing correction of all fields in CIFER by the applicant.</p> <p>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。</p>	

	<p>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。</p>	
<p>Registration / Correction / Amendments 注册/变更/修改</p>	<p>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: <i>“HsCiqCode: xxxx has been updated, please reselect it!”</i> 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.</p> <p>Could GACC consider this situation and accept the registration demand with only the HS codes of products actually exported?</p> <p>Is there a better way to delete the relevant HS codes?</p> <p>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：<i>“HsCiqCode: xxxx 已被更新，请重新选择！”</i> 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。</p>	

	<p>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。</p> <p>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？</p> <p>是否有更好的方法来删除相关的 HS 编码？</p>	
--	--	--

Questions related to self-registration (Article 9)

有关自行注册的问题（第九条）

General topic 整体问题	Question by EU 欧盟的问题	Response by GACC 海关总署的答复
<p>Registration / Procedure 注册/程序</p>	<p>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 <i>but still originated from country A from a custom perspective.</i></p> <p>Could GACC confirm that the registered production site should be the <u>bottling site</u> exporting the product to China (i.e. country B), even if the accompanying certificate of</p>	

	<p>origin features a different country (country A) as country of origin?</p> <p>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，<i>但从海关的角度来看，产品仍然来自 A 国。</i></p> <p>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？</p>	
<p>Registration / Procedure 注册/程序</p>	<p>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).</p> <p>Could GACC allow for more flexibility in the entry of container sizes?</p> <p>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）。</p> <p>海关总署能否允许在输入容器容量方面有更大的灵活性？</p>	
<p>Registration / Procedure 注册/程序</p>	<p>"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.</p>	

	<p>Would it be possible to provide feedback in English language?</p> <p>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。对于机构和部门来说，要理解海关总署对申请的反馈是一个挑战。</p> <p>是否有可能用英语提供反馈？</p>	
<p>Registration / Procedure 注册/程序</p>	<p>Also the "Declaration for the extension of registration of manufacturer" (Annex 16) is only available in Chinese in CIFER.</p> <p>Would it be possible to provide the Declaration in English language?</p> <p>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？</p>	
<p>Registration / Procedure 注册/程序</p>	<p>Difficulty in adding multiple locations for a single company.</p> <p>无法为一个公司增加多个地址。</p>	
<p>Registration / Procedure 注册/程序</p>	<p>A new functionality has been added a few months ago to the CIFER platform, named ‘account certification’.</p> <p>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.</p>	

	<p>Would it be possible to ensure that the functionality “account certification” is only available for registrations with recommendation under Article 7?</p> <p>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。</p> <p>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。</p> <p>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？</p>	
<p>Registration / Correction / Amendments 注册/变更/修改</p>	<p>Companies which use the self-registration route face difficulties on a regular basis when modifying their registration.</p> <p>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.</p> <p>Could GACC confirm that an existing registration remains valid while GACC reviews any requested changes?</p>	

	<p>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?</p> <p>使用自行注册途径的公司在修改其注册时经常遇到问题。</p> <p>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。</p> <p>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？</p> <p>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？</p>	
<p>Registration / Correction / Amendments 注册/变更/修改</p>	<p>Difficulty/impossibility of changing master data within the profile of the company registered on the platform.</p> <p>CAGG should consider allowing correction of all fields in CIFER by the applicant.</p> <p>无法更改在平台上注册的公司简介内的主数据。</p> <p>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。</p>	

<p>Registration / Correction / Amendments 注册/变更/修改</p>	<p>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.</p> <p>In several cases, data uploaded into CIFER were lost and had to be re-entered.</p> <p>Could GACC address these technical issues to ensure it does not happen again?</p> <p>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。</p> <p>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。</p> <p>海关总署能否解决这些技术问题以确保不再发生该情况</p>	
<p>Registration / Procedure 注册/程序</p>	<p>EU Member States are still facing a lot of technical issues and problems with CIFER and would welcome a training on CIFER.</p> <p>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。</p>	