

Export to China: Pet Food (including treats and chews) containing animal-origin ingredients

This information pertains to pet foods, defined as: commercially-processed, finished food (including snacks, treats, or chews) intended for feeding to companion animals (e.g. dogs, cats, or other non-livestock species kept as household pets); includes dry, canned and wet, and semi-moist products.

As of August 15, 2020, all pet foods containing animal-origin ingredients intended for export to China must comply with these new requirements, and be certified with the new letterhead certificate.

Requirements for pet foods containing only non-animal-origin ingredients are not known at this time. Requirements for pet food ingredients may be found at Non-Ruminant Feeds, Feed Ingredients, and Animal Fats. For requirements for supplements or feed additives, please contact the U.S.D.A. Agricultural Marketing Service. More information may be found at <https://www.ams.usda.gov/services/auditing/feed-export-china>.

Facility Approval Process

Manufacturing facilities must be inspected and approved by APHIS Veterinary Services (VS) prior to export and annually to maintain approval to export. Please contact your pertinent VS Service Center for more information regarding the APHIS inspection and approval process. Manufacturing facilities must also be currently registered with the U.S. Food and Drug Administration.

New facilities will receive an APHIS approval number after APHIS inspection and approval. APHIS then submits the information to China's General Administration of Customs (GACC), and GACC assigns the facility a Chinese approval number (NR-USA-XXX) and publishes the information on its website. A manufacturing facility must have both an APHIS and a Chinese approval number, and be listed on GACC's website, for pet foods they produce to be eligible for export.

APHIS will submit facility updates to GACC on a monthly basis, and GACC will update its website within 20 working days of receipt. Once GACC updates its website, APHIS will notify the facility. It is the responsibility of the facility to confirm their information is listed accurately on the Chinese website and this may be verified through the Chinese importer.

In addition to the facility approval and registration process, the exporting company must complete a separate product registration process with China's Ministry of Agriculture and Rural Affairs (MARA). Exporters are encouraged to work with their Chinese importers to accomplish this process. APHIS does not verify product registration prior to endorsement of certificates, therefore it is the exporter's responsibility to ensure product eligibility prior to shipment.

Additional Information

China permits the inclusion of animal-origin ingredients derived from poultry, livestock (swine and ruminants), farmed terrestrial animals, aquatic animals (farmed or wild-caught) and bees. Ingredients derived from wild terrestrial animals, reptiles, amphibians and insects other than bees are prohibited. All U.S. origin bovine (cattle and bison) ingredients authorized for domestic pet food production are allowed. Imported ingredients are allowed with the exception of certain ruminant materials. Sheep/lamb and goat ingredients must be of Australian/New Zealand origin. Bovine dairy, bovine gelatin, bovine collagen, and bovine tallow with maximum level of insoluble impurities of 0.15% by weight may be legally imported from any country. All other bovine materials must be legally imported from one or more of the following

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countries: Argentina, Australia, Chile, Colombia, Costa Rica, Mexico, New Zealand, Nicaragua, Panama, Paraguay, Peru, and/or Uruguay.

All facilities currently approved to export pet food to China will need to verify that currently approved ingredients and products meet the new requirements, prior to requesting endorsement of the new certificate. Facilities should submit a signed, notarized affidavit to VS in accordance with the Export Certification Requirements section below. Facilities interested in amending their approval to include newly allowed ingredients should contact their pertinent VS Service Center for guidance as to the steps necessary to amend their approval. Amendments to ingredient species must be approved by APHIS and updated on the Chinese website before the facility may ship product.

Manufacturers/exporters are responsible for ensuring pet foods meet relevant domestic Chinese regulations regarding safety, hygiene, and labeling. These requirements may be found at:

http://www.moa.gov.cn/gk/tzgg_1/gg/201805/t20180504_6141413.htm.

Export Certification Requirements

The fillable “Export Certificate for Animal Products” VS Form 16-4 may NOT be used for pet food certified under this protocol. The required letterhead certificate is available as a fillable PDF on the main China IREGs page. The certificate should be printed on security paper as is, and NOT transferred to local VS office letterhead. The certificate may not be modified. Product that does not meet the requirements will not be permitted into China.

A notarized affidavit should be prepared with the required certification statements listed under the notarized affidavit line on the certificate. If assistance is needed in preparing a properly notarized affidavit, please work with the VS Service Center that will be endorsing the export certificate.

- A. Leave the “Certificate Number” and “Date” blocks at the top of each certificate page blank. [These sections will be completed by the VS Service Center endorsing the certificate.]
- B. Under the statement “This office has on file a notarized affidavit from,” enter the name of the company providing the notarized affidavit. The affidavit should come from the manufacturer.
- C. For statement #4, do not line out or otherwise alter this statement.
- D. For statement #5, mark the applicable box [only one may be checked].
- E. For statement #6, mark all applicable boxes. For imported bovine ingredients, do not line out or otherwise alter this statement.
- F. For statement #9, mark all applicable boxes. Do not line out or otherwise alter this statement. Please submit copies of relevant negative lot-specific test results, as required per the facility’s approval¹.

¹ Lot-specific test results for Salmonella and Enterobacteriaceae are only required when pet foods are produced under the third processing option for dry and other products; endorsing officials should reference VS’ internal database to confirm whether test results are needed.

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- G. Leave the “Date,” “Signature,” “Printed name and title of the signatory,” and “VS Office issuing certificate” sections blank. [These sections will be completed by the VS Service Center endorsing the certificate.]
- H. In the “Product” section I, the type of animal product(s) and the species of origin must be included, as well as quantity and unit of measure. No additional information should be included.
- I. In the “Name and Address of Exporter” section II, the Chinese registration/approval number (NR-USA-XXX) must also be included. If the exporter is not the manufacturer, the manufacturing facility’s name, address, and Chinese approval number must be listed in the “Manufactured by” section. If the exporter and the manufacturer are the same, list “SAME” in this section. If the packaging does not contain the manufacturer’s name exactly as listed on China’s website, please contact VS.
- J. In the “Identification of Shipment” section IV, enter the pertinent information sufficient to link the products being exported with the certificate (e.g. container numbers, lot numbers or other similar identifying information appearing on other export documents accompanying the shipment). Include the container and seal numbers if appropriate.