

Questions from spiritsEUROPE and CEEV

EU-China Wine & Spirits WG

中欧葡萄酒与烈酒工作组

欧洲烈酒联盟和欧洲葡萄酒公司委员会问题清单

I. Labelling/标签

1. General questions to GACC on implementation of labelling rules

关于海关将如何实施总局标签相关法规的问题

a. The provisions related to information labelling on easy-to-open packages in GB7718-2011 have been replicated in the SAMR Food Labelling Supervision and Administration Measures (article 10)

原《食品安全国家标准预包装食品标签通则》(GB7718 - 2011) 中有关易开启包装的外包装上可以豁免强制性信息标注的规定, 已在国家市场监督管理总局《食品标签监督管理办法》第 10 条中重新做出相同的规定。

Could GACC confirm that Customs will recognize the exemption of mandatory information labelling of easy-to-open/transparent packages, as foreseen in the SAMR Food Labelling Supervision and Administration Measures (article 10)?

请海关总署确认, 海关将认可国家市场监督管理总局《食品标签监督管理办法》第 10 条对易于开启 / 透明包装的外包装上强制性信息标注的豁免?

答:《中华人民共和国食品安全法》规定“进口食品应当符合中国法律法规和食品安全国家标准”,“县级以上人民政府食品安全监督管理部门对国内市场销售的进口食品、食品添加剂实施监督管理”。进口食品进入国内市场流通领域应当符合市场监管部门的监督管理要求。《食品标签监督管理办法》规定“在中华人民共和国境内生产、销售的食品和食品添加剂的标识标注及其监督管理, 适用本办法”。《食品标签监督管理办法》相关规定, 即“最小销售单元有多少个独立包装或者有多层包装的, 如外包装易于开启识读或者透过外包装能清晰识读内包装上的强制标示事项, 可以不再外包装上重复标注”。进口预包装食品在中国境内销售应当符合上述规定。市场监督管理部门对《食品标签监督管理办法》相关规定进行释义, 如有相关问题, 可向询问政策制定部门。

According to the *Food Safety Law of the People's Republic of China*, “imported food shall comply with Chinese laws and regulations and national food safety standards,” and “food safety supervision and administration departments of the people's governments at or above the county level shall conduct supervision and administration over imported food and food

additives sold on the domestic market.” Imported food entering the domestic market circulation shall comply with the supervision and administration requirements of the market regulation authorities.

The *Measures for the Supervision and Administration of Food Labeling* provide that “the labeling and identification of food and food additives produced and sold within the territory of the People’s Republic of China, as well as their supervision and administration, shall be governed by these Measures.” According to the relevant provisions of the *Measures for the Supervision and Administration of Food Labeling*, “where the minimum sales unit contains multiple independent packages or has multiple layers of packaging, if the mandatory labeling information on the inner packaging can be easily opened and read from the outer packaging, or can be clearly read through the outer packaging, it is not necessary to repeat the labeling on the outer packaging.”

Imported prepackaged food sold within the territory of China shall comply with the above provisions. Market regulation authorities provide interpretations of the relevant provisions of the *Measures for the Supervision and Administration of Food Labeling*. For related questions, inquiries may be directed at the policy-making authorities.

Could GACC confirm that the production date will only need to be provided on the bottle, and not on an easy to open external package?

请海关总署确认，生产日期只需在瓶身上标注，而无需在易于开启的外包装上标注？

答：易于开启的外包装作为销售包装，其标示内容也属于标签的一部分，外盒英文内容如标示《国家食品安全标准预包装食品标签通则》GB7718 及其他法律、法规、食品安全标准要求的强制性标示内容，中外文应有一一对应关系。标签上可见的其他外文或繁体字所表述的内容应与规范汉字有对应关系(商标、进口食品的生产者和地址、国外经营者的名称和地址、网址除外)。

The outer packaging that is easy to open, as the sales packaging, and its labeling content also constitute part of the food label. If the English content on the outer box indicates the mandatory labeling information required by the National Food Safety Standard for the Labeling of Prepackaged Foods (GB 7718) and other relevant laws, regulations, and food safety standards, the Chinese and foreign language versions shall correspond to each other on a one-to-one basis.

Any other foreign languages or traditional Chinese characters visible on the label shall have corresponding content in standard Chinese characters (except for trademarks, the name and address of the producer of imported food, the name and address of overseas operators, and website addresses).

2. GB7718-2025

a) Regarding the translation between foreign language and Chinese language for non-mandatory information (e.g. marketing information: brand/château history) in the new version of GB7718:

关于新版 GB7718 中非强制性信息（如营销信息：品牌 / 酒庄历史）的外文与中文互译：

- Could the translation of the non-mandatory information be provided in a summarised manner the form of an additional supporting material (such as an accompanying instruction manual) and/or digital labelling?
非强制性信息的翻译能否以摘要的形式，通过附加的辅助材料（如附带的说明书）和 / 或数字标签的方式提供？

答：建议由卫健委答复，以下仅供参考。根据《国家食品安全标准预包装食品标签通则》（GB7718-2025）问答，非强制性内容应有对应关系，对应关系无需全部翻译，但应标明外文标签的主要内容或涵义。对于非强制性内容，可采用中文概述对外文内容进行描述，如“本产品外文标签还包括品牌信息、商标相关信息等内容”。通过加贴标签等形式遮盖的外文，无需进行翻译。另外，“附加的辅助材料（如附带的说明书）和 / 或数字标签”，其上的内容均属于标签信息。

It is recommended that the National Health Commission provides the official reply to this question. The following is for reference only. According to the Q&A of the *National Food Safety Standard — General Standard for the Labeling of Prepackaged Foods* (GB 7718-2025), non-mandatory information shall have corresponding content. Such correspondence does not require full translation, but the main content or meaning of the foreign-language label shall be indicated.

For non-mandatory information, a Chinese summary may be used to describe the foreign-language content, such as: “The foreign-language label of this product also includes brand information, trademark-related information, etc.” Foreign-language text that is covered by means such as affixed labels does not need to be translated.

In addition, “supplementary materials (such as enclosed instructions) and/or digital labels,” and the content thereon, all constitute label information.

b) The new version of GB7718 provides protection for the production lot number (lot code) of imported alcoholic beverages when used instead of the production date.

新版 GB7718 允许进口饮料酒若使用生产批号（批次代码）替代生产日期，并对生产批号进行保护。

- In the future, could the Customs increase its random inspection efforts to crack down on acts of destroying or tampering with production lot numbers, considering the fact that a batch number must not be affixed, overprinted or altered, according to the Q&A on the National Food Safety Standard: General Rules for the Labelling of Prepackaged Foods (GB7718-2025) (answer to Q50)

未来，海关能否加大随机抽查力度，打击破坏或篡改生产批号的行为，鉴于根据《国家食品安全标准预包装食品标签通则》(GB7718-2025) 问答（第 50 问）的规定，批号不得粘贴、改印或更改？

答：根据 GB7718-2025 第 10.2 条规定，“在标示了批号的前提下，葡萄酒及酒精度大于或等于 10% 的酒类可免于标示生产日期”。GB7718-2025 问答第五十条也明确，“在此情况下标示的批号不得加贴、补印、修改”

According to Article 10.2 of GB 7718-2025, *National Food Safety Standard — General Standard for the Labeling of Prepackaged Foods*, “provided that a batch number is indicated, wine and alcoholic beverages with an alcohol content of 10% or above may be exempt from indicating the production date.”

Article 50 of the GB 7718-2025 Q&A further clarifies that “under such circumstances, the indicated batch number shall not be affixed, reprinted, or altered.”

- Can GACC confirm that replacing the production date with the lot code will not have any impact on enterprises' obtaining import health inspection certificates?

海关总署能否确认以批号代替生产日期不会对企业取得进口卫生检验证书产生影响？

答：根据《国家食品安全标准预包装食品标签通则》(GB7718-2025) 及其问答，在标示了批号的前提下，葡萄酒及酒精度大于或等于 10%的酒类可免于标示生产日期、保质期和保质期到期日，符合要求的不会对企业取得入境货物检验检疫证明产生影响。

According to the *National Food Safety Standard — General Standard for the Labeling of Prepackaged Foods* (GB 7718-2025) and its Q&A, provided that a batch number is indicated, wine and alcoholic beverages with an alcohol content of 10% or above may be exempt from indicating the production date, shelf life, and expiration date. Compliance with these requirements will not affect an enterprise's obtaining of the Entry Goods Inspection and Quarantine Certificate.

c) Given the long shelf-life of certain products, it is necessary that SAMR and the NHC confirm that products produced prior to the entry into force of GB7718-2025 will be exempted from the new rules and only need to comply with GB7718-2011, with the production date being the reference in this case. Can GACC confirm that products produced prior to 16 March 2027 will only need to comply with GB7718-2011?

鉴于某些产品的保质期较长，请国家市场监督管理总局和国家卫生健康委员会确认，在 GB7718-2025 正式生效前已生产的产品，可豁免遵守新规定，只需符合 GB7718-2011 的要求，在此情况下以生产日期为参考标准。

海关总署能否确认，在 2027 年 3 月 16 日之前生产的产品，只需符合 GB7718-2011 的要求？

答：建议由卫健委答复，以下仅供参考：根据国家食品安全风险评估中心的答复，在新标准实施日期前已经生产的食品可以在保质期内继续销售。GB7718-2025 正式生效前（2027年3月16日）已生产的产品，企业可自愿选择执行新标准或旧标准。

It is recommended that the National Health Commission provide the official reply; the following is for reference only: According to the response from the National Center for Food Safety Risk Assessment, food produced before the implementation date of the new standard may continue to be sold within its shelf life. For products produced before the formal effective date of GB 7718-2025 (March 16, 2027), enterprises may voluntarily choose to follow either the new standard or the previous standard.

d) The production date and the expiration date of the shelf life shall be marked in a form with obvious contrast such as black characters on a white background to ensure clear readability. Are any other contrasting colours allowed both for the production date/expiration date and the background (other than black & white)?

生产日期、保质期到期日应当以白底黑字等对比明显的形式标注，保证清晰识读。生产日期、保质期到期日及其背景是否可以使用除黑白之外的其他对比颜色？

答：建议由市场监管总局答复《食品标签监督管理办法》第十二条相关规定。

It is recommended that the State Administration for Market Regulation provide the official reply regarding the relevant provisions of Article 12 of the *Measures for the Supervision and Administration of Food Labeling*.

e) Do food flavourings or flavouring essences include natural flavours and fragrances?
食用香精香料是否包含天然香料和香精？

答：按照《食品安全国家标准 食品添加剂使用标准》（GB2760-2024）B.2.1“食品用香料包

括天然香料和合成香料两种”。

According to the *National Food Safety Standard — Standards for the Use of Food Additives* (GB 2760-2024) B.2.1, “food flavourings include both natural flavourings and synthetic flavourings.”

f) Could the NHC confirm that cartoon drawings may be used to illustrate the natural flavours and fragrances used in the product and for marketing purposes only?
请国家卫健委确认，卡通图画可用于展示产品中使用的天然香料和香精，但仅作营销用途？

g) Articles 4.3.4.2 and 4.3.4.3: The restriction on using the INS number of a food additive in the ingredient labelling of a foodstuff, where the largest surface area of the packaging is greater than 60 cm² runs counter to Codex Alimentarius provisions on general labelling practices¹. We request to maintain the flexibility for doing so.

¹ CXS 1-1985, Section 4.2.3.3

第 4.3.4.2 条和第 4.3.4.3 条：当包装最大表面积大于 60 平方厘米时，禁止在食品配料标签中使用食品添加剂的 INS 编号，这与食品法典委中关于通用标签规范的规定相悖。我们请求保留这样做的灵活性。

答：建议由卫健委答复。《食品安全法》规定“对食品安全标准执行过程中的问题，县级以上人民政府卫生行政部门应当会同有关部门及时给予指导、解答”。

It is recommended that the National Health Commission provide the official reply. The *Food Safety Law* stipulates that “for issues arising during the implementation of food safety standards, the health administrative departments of people’s governments at or above the county level shall, in coordination with relevant departments, provide timely guidance and answers.”

h) Article 9, Digital Labelling:

第九条，数字标签

Paragraph 1 of the NHC & SAMR guidelines on digital labelling states that “other information such as advertisements and marketing materials shall not be part of the digital label”. Could NHC confirm that the voluntary provision of sustainability, nutritional and health information, information on the product, as well as links to corporate/brand websites remain acceptable? 国家卫生健康委员会和国家市场监督管理总局关于数字标签的指南第一条指出：“广告、促销等其他信息不得作为数字标签的内容”。

请国家卫生健康委员会确认，自愿提供有关可持续性、营养和健康的信息、产品相关信息，以及企业 / 品牌网站链接等内容是否仍被允许？

i) Could NHC clarify under which conditions the date marking might differ from the prescribed YYYY/MM/DD format, as suggested in Appendix A of GB 7718-2025?

请国家卫健委明确，在哪些情况下，日期标注可不同于 GB 7718-2025 附录 A 中建议的 YYYY/MM/DD 格式？

j) Could GACC confirm that the Chinese label can be affixed at the origin as well as in bonded warehouses before entering the Chinese market, as is the currently the case?

请海关总署确认，中文标签既可在原产地加贴，也可在进入中国市场前在保税仓库加贴，即保持当前做法不变？

答：根据《进出口食品安全管理办法》要求，进口保健食品、特膳食品的中文标签必须印制在最小销售包装上，不得粘贴。预包装食品没有中文标签、中文说明书或者标签、说明书不符合本规定的，不得进口。

According to the *Measures for the Administration of Import and Export Food Safety*, the Chinese label of imported health foods and special dietary foods must be printed on the smallest sales packaging and shall not be affixed separately. Prepackaged foods without a Chinese label or Chinese instructions, or whose labels or instructions do not comply with these requirements, shall not be imported.

3. SAMR Food Labeling Supervision and Administration Measures

国家市场监督管理总局《食品标签监督管理办法》

a) Article 11: Could SAMR confirm that the required labelling items can be labelled either on the front or back label in normal Chinese characters? This is important in order to avoid translation of the front labels, which are usually standardised across all export markets for marketing, brand recognition purposes as well as to streamline labelling costs.

第 11 条：请国家市场监督管理总局确认，要求标识的项目可标注在正面标签、背面标签上，或用规范汉字标注在贴纸（标签贴）上？这一点很重要，可避免对正面标签进行翻译——出于营销、品牌认知目的，且为简化标签成本，正面标签在所有出口市场通常是标准化的。

b) Article 13.2: In previous answers to the EU, SAMR confirmed that Chinese labels (i.e. labels bearing mandatory information in Chinese) must comply with the provisions of previous text regarding the minimum height and format of words. Could SAMR also confirm whether information in other languages, such as that found on front labels common to all export markets, is exempt from these requirements?

第 13.2 条：在此前对欧盟的答复中，国家市场监督管理总局确认，中文标签（即包含中文强制性信息的标签）必须符合此前关于文字最小高度和格式的规定。

请国家市场监督管理总局进一步确认，用其他语言标注的信息（例如出口市场通用的正面标签信息）是否可免于遵守这些要求？

c) Article 17.1:

第 17.1 条

In previous answers, SAMR confirmed that Article 8.3 of GB7718-2025 is the reference when it comes to the labelling of the name, address and contact information of the operator for imported prepackaged foods. This article states that the name, address and contact information of the “importer/agent” (进口商/代理商) must appear on the label. Could GACC (or NHC) confirm that the name, address and contact information of the “distributor” (经销商) can be used on the label, as has been the case until now, provided the distributor bears legal responsibility for food safety in China? For contractual reasons, a wine or spirits producer may not be identified on the product label when the product has been sold to another party (the operator), who is responsible for placing it on the market, and who remains able to ensure full traceability if needed. In such cases, the operator assumes legal responsibility and should therefore be allowed to appear on the label in place of the producer, as permitted by GB7718-2025.

第 17.1 条：

在此前的答复中，国家市场监督管理总局确认，关于进口预包装食品经营者名称、地址及联系方式的标签要求，以 GB7718-2025 第 8.3 条为参考。该条规定，标签上必须标注“进口商/代理商”的名称、地址及联系方式。请海关总署（或国家卫生健康委员会）确认，如经销商（经销商）在中国承担食品安全法律责任，其名称、地址及联系方式是否可以像目前一样出现在标签上，替代生产者？

出于合同原因，当葡萄酒或烈酒已售予另一方（即经营者），且由该经营者负责将产品投放市场并能在需要时确保完整追溯时，产品标签上可能不标识生产者。在此类情况下，经营者承担法律责任，因此应如 GB7718-2025 所允许的那样，允许其在标签上替代生产者出现。

答：建议由市场监管总局答复，以下仅供参考：根据 GB7718-2025 第 8.3 条规定 “进口预包装食品应标示进口商/代理商的名称、地址和联系方式，以及境外生产企业在华注册编号或者所在国家或地区主管当局批准的注册编号。进口食品的生产者和地址、国外经营者的名称和地址可以不标示。” 及问答第四十九条 “进口预包装食品应根据进口食品境内承担食品安全法律责任的实际情况标示进口商、代理商的名称、地址和联系方式。进口商为承担责任主体的，应以进口商为引导词；代理商为承担责任主体的，应以代理商为引导词”。经营者与生产者本质不同，不存在替代关系。

It is recommended that the State Administration for Market Regulation provide the official reply; the following is for reference only: According to Article 8.3 of GB 7718-2025, “imported prepackaged foods shall indicate the name, address, and contact information of the importer/agent, as well as the registration number of the overseas manufacturer in China or the registration number approved by the competent authority of the country or region of origin. The producer and address of the imported food, and the name and address of the foreign operator, may not need to be indicated.”

Furthermore, Article 49 of the Q&A states: “Imported prepackaged foods shall indicate the name, address, and contact information of the importer or agent based on the actual party assuming food safety legal responsibility within China. If the importer is the responsible party, it shall be indicated with ‘importer’ as the lead term; if the agent is the responsible party, it shall be indicated with ‘agent’ as the lead term.”

The operator and the producer are essentially different and cannot be used interchangeably.

4. Specific additional questions

a) For the English expression of "Imperial Special Supply", can the translation be exempted?

对于皇家特供的英文，是否豁免翻译？

答：建议由卫健委答复，以下仅供参考：根据 GB7718-2025 第 8.1.2 条规定，“标签上可见的其他外文或繁体字所表述的内容应与规范汉字有对应关系(商标、进口食品的生产者和地址、国外经营者的名称和地址、网址除外)”，标准中已明确。

It is recommended that the National Health Commission provide the official reply; the following is for reference only: According to Article 8.1.2 of GB 7718-2025, “any other foreign language or traditional Chinese characters visible on the label shall correspond to the standard Chinese characters (excluding trademarks, the producer and address of imported food, the name and address of overseas operators, and website addresses),” as clearly specified in the standard.

b) Food labels shall not be marked with: special supply, exclusive supply, "internal supply" for party and government organs or the military, etc. Can "JD.com Exclusive Supply" and "Wal-Mart Special Supply" be marked?

食品标识不得标注：特供、专供、“内供”党政机关或者军队等，可否标注“京东专供、沃尔玛特供”？

c) It is not allowed to claim "no sucrose added", but can we claim "0 sucrose" or "0 lactose" (supported by data, but not 0 sugar, containing other sugars)?

不能声称“不添加蔗糖”，但是是否可以声称“0 蔗糖”“0 乳糖”（有数据支持，但并非 0 糖，含有其他糖）？

答：建议由卫健委答复，以下仅供参考：GB7718-2025 问答第三十二条规定“当配料或成分在终产品中的含量为 0 时，可以使用‘无’、‘不含’等词汇及其同义语对相应配料或成分进行特别强调。”《食品安全国家标准 预包装食品营养标签通则》(GB28050) 对能量和某营养成分的含量声称有特殊规定时，应按照标准要求执行。当产品执行标准中设置了“无 XX”等界限值要求时，应从其规定。

It is recommended that the National Health Commission provide the official reply; the following is for reference only: Article 32 of the GB 7718-2025 Q&A stipulates that “when the content of an ingredient or component in the final product is 0, terms such as ‘none’ or ‘not containing’ and their synonyms may be used to specially emphasize the corresponding ingredient or component.”

When the *National Food Safety Standard — General Standard for the Nutrition Labeling of Prepackaged Foods* (GB 28050) has specific provisions for claims regarding the content of energy or certain nutrients, these provisions shall be followed. If the standard applicable to

the product sets a threshold requirement such as “contains no XX,” the product shall comply with that specified requirement.

II. Product standards & oenological practices/OIV/Codex Alimentarius

产品标准与酿酒实践 / 国际葡萄与葡萄酒组织 (OIV) / 食品法典委员会 (Codex Alimentarius)

1. We would be grateful if the Chinese Government could share with us how China is considering integrating the latest developments of the Codex Alimentarius General Standard on Food additives re. wine products in the Chinese regulation?

若中国政府能向我们说明，在葡萄酒产品方面，中国拟如何将《食品法典委员会食品添加剂通用标准》的最新进展纳入中国法规体系，我们将不胜感激。

2. Is the Chinese government thinking about a special procedure to include the adaptation of its wine production standard to the future updates of international standards on wine (OIV and Codex Alimentarius)?

中国政府是否能考虑设立特殊程序，以便使其葡萄酒生产标准能与葡萄酒国际标准（国际葡萄与葡萄酒组织及食品法典委员会标准）的未来更新相适配？

3. Will the Chinese government start a procedure to evaluate the adaptation of its wine production standard to the OIV Code of Oenological Practices?

中国政府是否会启动相关程序，评估使其葡萄酒生产标准与国际葡萄与葡萄酒组织《酿酒实践法典》相适配的事宜？