

1. SUMMARY

Food products classified as sports nutrition products are able to bypass the complex regulations China imposes on products classified as health food products, as long as they comply with the Food Safety National Standards ("食品安全国家标准"), adherence to which is checked by the State Administration of Market Regulation (国家市场监督管理总局, "SAMR", which carries out the work of the former China Food and Drug Administration, 国家食品药品监督管理总局, "CFDA"). The Food Safety National Standards were published in December 2015 and apply to food products classified as general food products or as sports nutrition food products (a type of food product). These types of product may therefore be imported directly into China without going through the General Administration of Customs' (中华人民共和国海关总署, "GACC") certification process, saving both time and money.

2. DEFINITION

In many countries, protein powders and amino acid supplements are classified as dietary supplements, which are a type of health food product. However, in China protein powders and amino acid supplements can be classified as sports nutrition food products, which are subject to the same regulations as general food products. This means that they are not required to go through the costly certification process required of health food products such as dietary

supplements, which have to meet strict regulations (such as those covering labelling and claims of improving the user's health) and, providing they meet the Food Safety National Standards, can be imported into China directly. Thus, the process of importing sports nutrition food products is often simpler and cheaper than that for health food products.

3. CATEGORIES

Sports nutrition food products in China fall into six categories. The first three classify the products based on their nutritional characteristics, and the next three are based on the characteristics of the sports done using them. It is possible for one sports nutrition food product to fall into multiple categories. The six categories are as follows:

1. Energy supplements

These are made of carbohydrates that can quickly and/or continuously provide energy.

2. Energy control supplements

These are divided into energy consuming energy control supplements and energy replacing energy control supplements; a maximum of 25% of the energy provided by them can come from fat.

3. Protein supplements

These are most commonly made of protein and/or protein hydrolysates, and promote the growth and recovery of body tissue.

4. Products mainly made of creatine

These boost speed and strength, and are used by those who do physical activities such as ball games, weightlifting, wrestling, martial arts, and general fitness exercises.

5. Products mainly made of vitamins B1 and B2

These boost endurance, and are used by those who do physical activities such as middle-distance running, jogging, biking, speed walking, swimming, boating, dancing, aerobic exercises, and other outdoor sports.

6. Products mainly made of peptides

These target recovery from exercise, and are used by those who are recovering after moderate or high intensity exercise or exercise that has been done over a sustained period of time.





4. MARKET ENTRY REQUIREMENTS

To begin the process of importing a sports nutrition food product into China, the **ingredients must be screened** by the SAMR. As it is classified as a food product, all the ingredients must be found on the **approved lists of general food raw ingredients**, **general food additives**, and **general food nutrition enhancers** issued by the SAMR, or compliant with special regulations for sports nutrition food products. No ingredient that is on the raw ingredients list for health food products may be used as a raw ingredient for a general food product.

In addition, the **quantity of each ingredient** is required to be within the recommended daily intake level set by the Food Safety National Standards. In this, caution must be taken as some ingredients may be on the raw ingredient list for health food products and the additive list for general food products, with differing limits. If there is too much of a certain ingredient in a sports nutrition food product then it may no longer be able to be classified as a sports nutrition food product, and instead will only be able to be classified as a health food product, incurring the extra costs that apply in this scenario. For example, vitamin C can be a raw ingredient in a health food product but only an additive in a general food product, meaning that the content level of vitamin C would determine whether the food product could be classed as a sports nutrition food product or a health food product.

If a product is to be classified as a general food product, it cannot be

claimed to have any functional health benefits, for example that it "alleviates physical fatigue" or "improves growth and development". Such claims require the food to be certified as a functional health food product and to follow the appropriate Chinese regulations set by the SAMR. It is recommended that producers and distributors of food products wishing to enter the market in China, but which have no documented sales or proven level of consumer demand in China apply for their products to be classified as general food products, so as to avoid the costly SAMR certification process.

All food products sold in China must **comply with Chinese labelling regulations** and be affixed with a Chinese label or sticker. Most problems faced by companies importing food products into China arise from incorrect labelling, which can delay passage of the food product through the Chinese customs process, and in some cases may lead to the food product being denied access to the Chinese market by the GACC. To reduce the risk of being stopped by the GACC, CBBC recommends going through BQS Filing, which is performed by the **China Certification & Inspection Group (**中国检验认证集团, "CCIC").

For further enquiries and help with exporting sports nutrition products to China please contact Mette Knudsen at: **Mette@knudsenchina.com** or Ran Guo at: **Ran.guo@cbbc.org.cn**.