

China Food Safety Law Implications for Health Foods

CMA & NPNZ Webinar
May 2016



China Food Safety Law (2015)

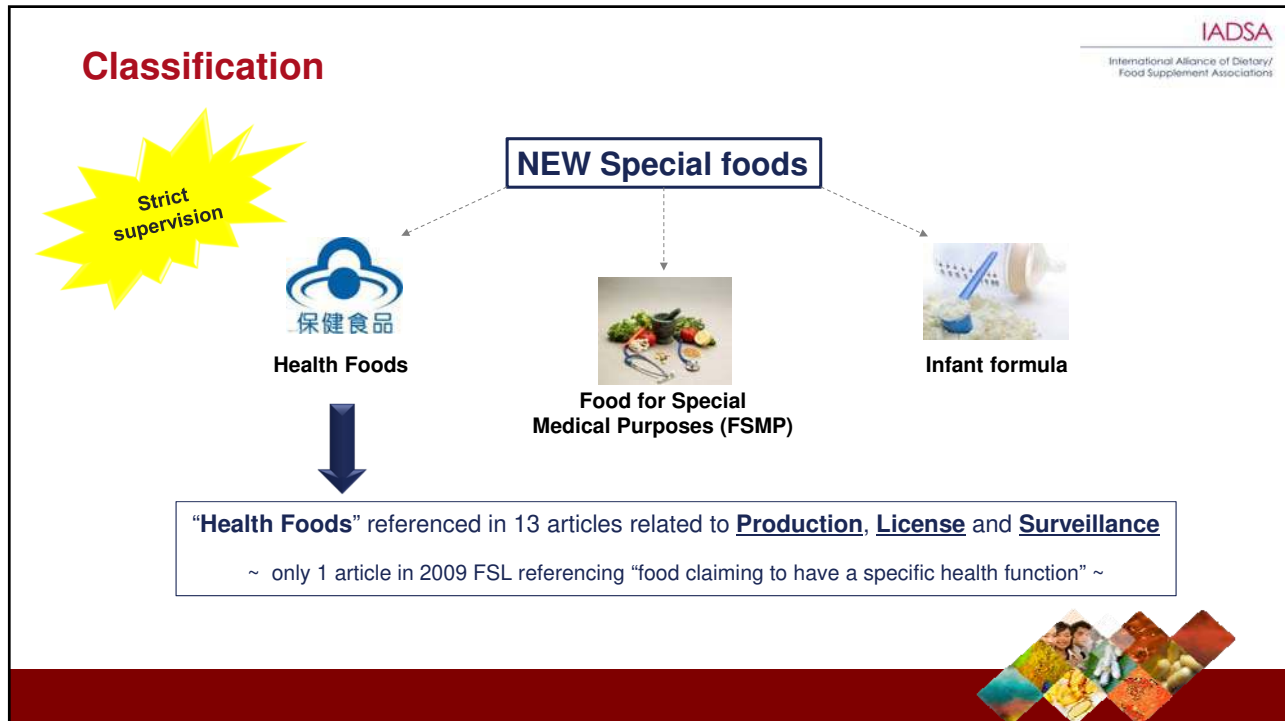
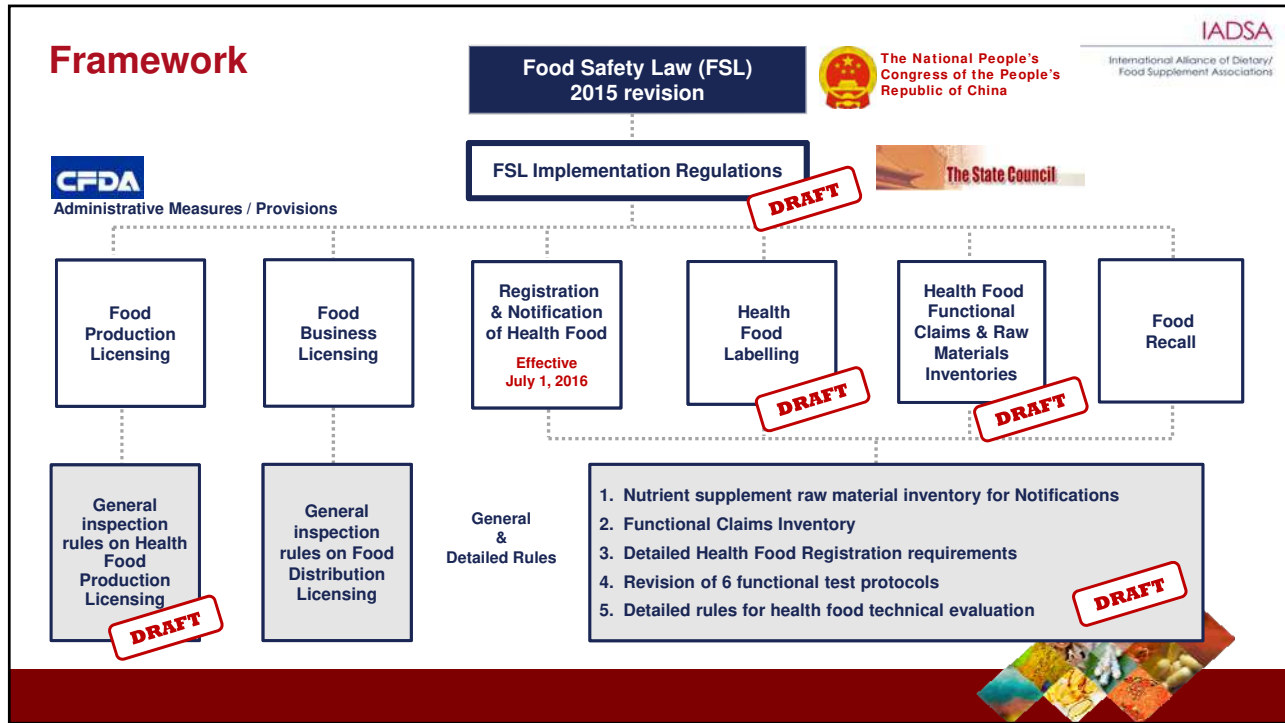
Stipulations related to health foods

Legal status "Health food" category retained
in Final law

Administrative direction Notification and registration
system

Responsibility CFDA to issue affiliated
regulations





Definition





FSL Implementing Regulations (DRAFT) - Article 195

- **Health foods:** a food with **health function claims** or for **supplementing** nutrients (such as vitamins/minerals), for **regulating body functions**, not intended to cure diseases, containing specific functional ingredients, suited for specific groups of people, and with **fixed amount consumption**.
- **Special dosage food products with fixed amount consumption:** foods in special dosage forms, such as capsule, oral agent, tablet, granules, and pills; such foods shall be consumed at fixed amount, or has daily intake volume.



Product Market Access

Notification (filing) system in addition to Registration

Registration	Using ingredients not in the Health Food Raw Material Inventory	
Registration	Health food imported for first time* (except nutrient supplements)	
Notification	Health food imported first time* that are nutrient supplements	
Notification	Using ingredient in the Health Food Raw Materials Inventory	

Notification steps

- 01 Manufacturer submits notification
- 02 Notification number issued on spot
- 03 Notification certificate generated
- 04 Publish on website

↓ within 3 months

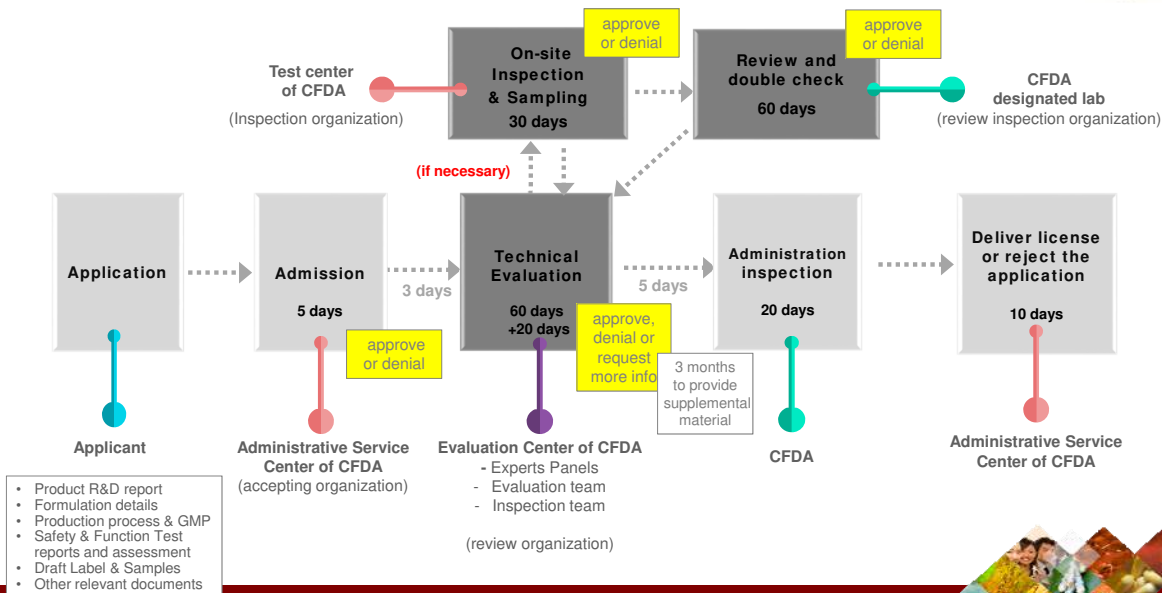
→ **import health food**

→ **apply for food production license**

* Health foods not from the same country, same company, or the same formula (FSL Implementing regulations - Dec 2015 DRAFT)



Registration



Health Food Inventories

Food Safety Law calls for CFDA to publish these inventories together with NHFPC and SATCM

1. Raw Materials list

- Basis for notification
- Positive list of ingredients (name, dosage, claim)

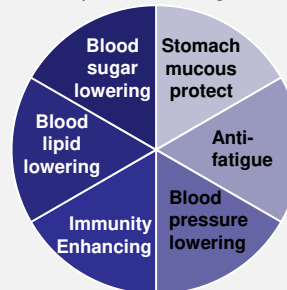
~ 1st list drafted ~



- Nutrient Supplement raw material list**
- 13 vitamins: A, B1, B2, B6, B12, C, D, E, K, niacin, folic acid, biotin, pantothenic acid
 - choline
 - 8 mineral: Ca, Mg, Zn, Fe, K, Mn, Se, Cu
 - sources of nutrients
 - minimum and maximum limits

2. Functional claims list

- List of categories of functional claims allowed
- Reviewing current 27 Functional claims
- Functional Test protocols being revised



NHFPC = National Health and Family Planning Commission
SATCM = State Administration of Traditional Chinese Medicine





营养素补充剂新规 政企协研对话会

Workshop on New Regulation of
Nutrients Supplement



中国营养学会
Chinese Nutrition Society



中国营养保健食品协会
China Nutrition and Health Association



CNHFA



CNS



IADSA



Peking
University



CFDA

Key Topics Discussed

- Safety based Vitamin & Mineral limits
- Natural & New Sources of nutrients
- Products outside scope of inventory



IADSA

International Alliance of Dietary/
Food Supplement Associations

Thank You!

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