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2018 Year-in-Review: China's Food Packaging Laws

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In 2018, the food and food packaging industry witnessed many changes within China's regulatory system, beginning with the National People's Congress (NPC) - China's national legislative body - embarking on a massive restructure of its organizational bodies, which extended to many of its food regulatory agencies. (For more information on the restructure, see the PackagingLaw.com article, [China Establishes New Food and Food Related Agencies.](#))

Since then, there have been structural reforms and nomenclature changes involving governmental agencies at both national and local levels. Below is a review of the changes in 2018 that impacted food packaging.

To help industry better understand and implement the food packaging GB Standards, in 2018 China's National Center for Food Safety Risk Assessment (CFSA) published a guidance book titled, *Implementation Guidance on Migration Testing Standards for Food Contact Materials and Articles*, which contains comprehensive and practical interpretations and guidance for the implementation of GB 31604.1-2015 (*General Rules for Migration Testing on Food Contact Materials and Articles*) and GB 5009.156-2016 (*General Rules for Migration Testing Pre-treatment Methods for Food Contact Materials and Articles*).

In November 2018, the State Administration for Market Regulation (SAMR) published the long-awaited *General Rules for the Implementation of Production Licensing for Industrial Products* and the corresponding product-specific detailed implementation rules for production licensing relating to food-contact products (a.k.a. "QS" licensing). The QS licensing system applies to various product categories including food packaging materials (e.g., plastic packaging, tools, paper packaging and containers).

The Chinese government continues to heighten its supervision of food contact materials. For example, earlier this year a juice vending machine manufacturer was heavily fined after determining that a food-contact metal component inside the machine did not comply with the new GB Standard on food-contact metal materials and articles. Accordingly, industry should ensure strict compliance with China's applicable GB standards to avoid potential adverse impacts on their business activities.

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