



COMPARISON OF HYGIENE LEGISLATION AND FOOD SAFETY STANDARDS

For stuffed wheaten products and condiments

This publication was produced with the financial support of the European Union. It reflects an analysis undertaken by AETS which remains without prejudice to the interpretation or enforcement of applicable legislation of China by the competent authorities.

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INTRODUCTION

The overall objective of the project is to contribute to the facilitation of trade of certain categories of processed food between the European Union and the People's Republic of China by a systematic comparison of standards applicable to stuffed wheaten products.

This review explores specific Chinese Standards for the following food categorised which Chinese Food Business Operators must follow in the production of these food items.

1. Stuffed Wheaten Products (Quick frozen dumplings and Fillings for foods)
2. Edible Grain/Milled grain industry products and malt (Plant protein beverage -- Soymilk and soymilk beverage, Instant soymilk powder and soy milk with dairy product powder)
3. Condiments (National food safety standard -- Compound seasoning)

It should be noted that common challenges (outlined under) faced when comparing Chinese standards with EU legislation equally apply in the case of the standards covered by this review.

- a. There is no open access to Chinese regulatory documents in food hygiene.
- b. The absence of officially translated standards in the English language.
- c. The lack of a standard layout in texts.
- d. No consistency in how requirements for example structures, processing, sampling and testing are dealt with.

Each Standard has been verified as the most up to date one available at the time of the evaluation.

Points of interest and possible variation with the relevant EU Legislation have been flagged, where possible.

Tables of comparison have been added when the need to indicate deviations between the PRC and EU Standards has been identified. These tables relate mainly to differences in levels for contaminants, pesticides, and additives.

LIST OF CHINESE NATIONAL STANDARDS ASSESSED

STUFFED WHEATEN PRODUCTS

GB/T 23786-2009 Quick-frozen dumpling

GB/T 21270-2007 Filling of foods

EDIBLE GRAIN / MILLED GRAIN INDUSTRY PRODUCTS AND MALT

GB/T 30885-2014 Plant protein beverage - Soymilk and soymilk beverage

GB/T 18738-2006 Instant soymilk powder and soy milk with dairy product powder

CONDIMENTS

GB 31644-2018 National food safety standard -- Compound seasoning



RESULTS AND CONCLUSIONS

This review explores specific Chinese Standards for the following food categorised which Chinese Food Business Operators must follow in the production of these food items.

4. Stuffed Wheaten Products (Quick frozen dumplings and Fillings for foods)
5. Edible Grain/Milled grain industry products and malt (Plant protein beverage -- Soymilk and soymilk beverage, Instant soymilk powder and soy milk with dairy product powder)
6. Condiments (National food safety standard -- Compound seasoning)

The PRC legislation is a multi-layer-based structure making the search of relative values and procedures complicated.

Whereas a horizontal approach to food hygiene legislation applies in the EU the PRC legislation (standards) tend to be specific for each food type and are very repetitive.

The definitions and food classifications used in Chinese standards differ from the terminology used in the EU making comparisons a little more challenging.

No comparison tables are provided where the standards are deemed to be broadly equivalent with EU requirements.

EU Food business operators should take particular note where minimum levels for contaminants, pesticides and additives, specified in the standards under review, are lower than those in EU legislation. It is recommended that a science-based sampling programme should be drawn up/agreed, within the community, which address these lower limits.

It is also recommended that the equivalence between test methods stipulated in these standards and those under EU legislation should be undertaken.



1 SUMMARY COMPARISON

1.1 Wheaten products

Chinese National Food Safety Standard		General Comments
GB/T 23786-2009 Quick-frozen dumpling	Definitions	There are no specific definitions of the terms “quick freezing” and “quick frozen dumpling” in EU food hygiene legislation
	Fillings	The type of filling used will dictate how the product is treated under EU rules e.g. meat preparations, composite products, foods of non- animal origin.
	Sensory	Not specified in EU legislation but covered by GMP and HACCP based procedures.
	Physical and Chemical Indicators	There are no levels set in EU legislation for some of the items mandated in PRC legislation for the particular food items e.g. peroxide value, acid value, arsenic level.
	Food additives	Some food additives mentioned in the Chinese National Standard are not approved in the EU while some EU approved additives are not mentioned in the Chinese National Standards. Differences in permissible levels have also been identified. There will be implications for trade where the levels in the PRC are lower than EU.
	Test Methods	Equivalence with international standards should be established in advance of trade.
GB/T 21270-2007 Filling of foods	Definitions	No equivalent definition in EU legislation.
	Sensory	No specified in EU rules but covered by GMP and HACCP based procedures.
	Food additives	Some food additives mentioned in the Chinese National Standard are not approved in the EU while some EU approved additives are not mentioned in the Chinese National Standards. Differences in permissible levels have also been identified. There will be implications for trade where the levels in the PRC are lower than EU.
	Test Methods	Equivalence with international standards should be established in advance of trade.

Details on the analysis are given in the following section.



1.2 Edible grain / Milled grain industry products and malt

Chinese National Food Safety Standard	General Comments			
GB/T 30885-2014 Plant protein beverage - Soy milk and soy milk beverage	Definitions	No equivalent definition in EU legislation.		
	Classification	Not mandated in the EU and most likely are dealt with in the EU by industry standards and good manufacturing practices.		
	Sensory	No specified in EU rules but covered by GMP and HACCP based procedures		
	Physical and Chemical Indicators	There are no equivalent levels mandated in EU legislation for some of the items mandated in PRC legislation. Regarding lactic acid- Commercial drivers will dictate the type and quantity of cultures used in the EU.		
	Test Methods	Equivalence with international standards should be established in advance of trade.		
GB/T 18738-2006 Instant soymilk powder and soy milk with dairy product powder	Definitions	With the exception of milk/dairy products there are no equivalent definitions in the EU for the foodstuffs in the scope of this standard. The current position regarding the ECJ ruling on the use of terms associated with milk should be clarified		
	Classification	Not mandated in the EU and most likely are dealt with in the EU by industry standards and good manufacturing practices. The Food business operator in the EU should be aware of the classifications used in the standard and should comply with any labelling requirements necessitated by such classifications		
	Sensory	No specified in EU rules but covered by GMP and HACCP based procedures		
	Physical and Chemical Indicators	There are no equivalent tables for contaminants in EU food hygiene regulations for the products in the scope of this standard with the exception of the food in the table. <table border="1" data-bbox="762 1301 1235 1491"> <tr> <td>Lead</td> <td>Raw milk (2), heat-treated milk and milk for the manufacture of milk-based products</td> </tr> </table>	Lead	Raw milk (2), heat-treated milk and milk for the manufacture of milk-based products
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Food Additive and Food Nutrition Fortification Requirements	EU Regulation 1333/2008 set down the maximum limits of food additives which are permitted, by food category. Regulation (EC) No 1925/2006 of the European Parliament and of the Council of 20 December 2006 on the addition of vitamins and minerals and of certain other substances to foods. Differences do exist between what is allowed in the EU in terms of additives and the addition of vitamins and minerals and what is required in the PRC.			
Test Methods	Equivalence with international standards should be established in advance of trade.			



1.3 Condiments

Chinese National Food Safety Standard	General Comments	
GB 31644-2018 National food safety standard -- Compound seasoning	Definitions	No equivalent definition in EU legislation.
	Sensory	No specified in EU rules but covered by GMP and HACCP based procedures
	Physical and Chemical Indicators	<p>The foodstuffs contained in this standard i.e. compound seasonings, including seasoned spirits, acidic seasoning liquid products, are not listed in Regulation 1881/2006 setting maximum levels for certain contaminants in foodstuffs.</p> <p>Food business operators may need to have the end product tested for the items in table two prior to trade and at a scientifically based frequency thereafter.</p>
	Food Additives	<p>Many of the additives listed in PRC legislation are not mentioned in the same food categories in EU legislation.</p> <p>5 items [Neotame, Carrageenan, Brilliant blue aluminium lake, Tartrazine, tartrazine aluminium lake, Sucralose, Diacetyl tartaric acid ester of mono (di) glycerides (DATEM)] are not specified in EU legislation for the food category that deals with seasonings and condiments.</p> <p>3 items in the PRC standard [Calcium Stearate, Potassium Stearate, Spirulina blue(algae blue, lina blue)] are not mentioned in the EU regulation.</p> <p>1 item has a lower limit [silicon dioxide] in the PRC than in the EU. FBOs must test to this level.</p>
	Contaminants	The foodstuffs contained in this standard i.e. compound seasonings, including seasoned spirits, acidic seasoning liquid products, are not listed in Regulation 1881/2006 as amended by Regulation 2023/915 setting maximum levels for certain contaminants in foodstuffs.
Test Methods	Equivalence with international standards should be established in advance of trade.	



2 DETAILED ANALYSIS

2.1 Chinese Food Safety Standard GB/T 23786-2009 Quick-frozen dumpling

Chinese National Standard GB/T 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation
<p>Scope</p> <p>This standard specifies the terms and definitions, classification, requirements, test methods, inspection rules, determination rules, hygiene requirements for production and processing, labelling, marking, packaging, transportation, storage, sales and recall requirements for frozen dumpling products.</p> <p>This standard applies to the production, inspection and sale of products defined by 3.2.</p>	<p>The relevant EU legislation dealing with the food items covered in the scope are specific legal instruments dealing with e.g.</p> <ul style="list-style-type: none"> • hygiene requirements, production, processing, storage, packaging and transport of food (Reg. 852/2004 and Reg. 853/2004), • labelling requirements (Regulation 1169/2011- as amended) and • product recall procedures (Reg. 178/2002). 	
<p>3 Terminology and definitions</p> <p>3.1 Quick freezing</p> <p>A method of freezing in which the product passes rapidly through a zone of maximum ice crystals in a low-temperature environment and completes the freezing process when its average temperature reaches -18°C.</p> <p>3.2 Quick-frozen dumpling</p> <p>Dumplings made from wheat flour or other starch-rich raw materials, with one or more fillings of meat, fish, eggs, vegetables, etc., which are shaped, cooked or uncooked, and frozen to a central temperature of ≤ -18°C.</p>	<p>There are no specific definitions of the terms “quick freezing” and “quick frozen dumpling” in EU food hygiene legislation.</p> <p>The definitions provided are self-explanatory and would be dealt with in the EU under HACCP procedures and good manufacturing practices.</p> <p>Industry guides may also exist for the products in question.</p>	<p><i>The temperature requirements specified are in line with EU norms.</i></p>



Chinese National Standard GBT 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation
<p>4 Classification</p> <p>4.1 According to the composition of the filling</p> <p>4.1.1 Meat: meat, poultry, animal products and their products or mixed with vegetables, eggs, bean products, etc. as the main raw material for the filling.</p> <p>4.1.2 Vegetarian fillings: fillings made with vegetables, beans, eggs, and their products as the main raw material.</p> <p>4.2 By processing method</p> <p>4.2.1 Quick-frozen raw products: products that are not cooked before being quick-frozen and need to be heated and cooked for consumption.</p> <p>4.2.2 Quick-frozen cooked products: products that have been cooked before quick-frozen and still require heating for consumption.</p>	<p>The classification used are by the composition of the filling and whether or not the product was raw or cooked prior to freezing.</p> <p>Regulation 853/2004 Annex 1 defined the following terms.</p> <p>'Meat preparations' means fresh meat, including meat that has been reduced to fragments, which has had foodstuffs, seasonings or additives added to it or which has undergone processes insufficient to modify the internal muscle fibre structure of the meat and thus to eliminate the characteristics of fresh meat.</p> <p>Commission delegated Regulation EU 2022/2292 defines composite product as</p> <p>'Composite product' means food containing both products of plant origin and processed products of animal origin;</p> <p>In relation to the method of processing the products would be regarded as either a raw product, a frozen composite product or a frozen product which required heating prior to consumption.</p>	<p><i>These types of products would fall under the following classification under EU legislation.</i></p> <p><i>Meat preparation where the filling contains fresh meat.</i></p> <p><i>Composite product where there is a combination of processed products and a product of plant origin.</i></p> <p><i>Accordingly, the rules applicable to these product categories in the EU would apply.</i></p>



Chinese National Standard GBT 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation
<p>5 Requirements</p> <p>5.1 Raw materials and auxiliary ingredients</p> <p>5.1.1 Drinking water It shall comply with GB 5749.</p> <p>5.1.2 Wheat flour Shall comply with the provisions of GB 1355.</p> <p>5.1.3 Fresh and frozen animal meat Should comply with the provisions of GB2707.</p> <p>5.1.4 Fresh and frozen poultry meat Should comply with the provisions of GB 16869.</p> <p>5.1.5 Vegetables Shall comply with relevant national standards or industry standards.</p> <p>5.1.6 Fresh and frozen animal aquatic products Shall comply with the provisions of GB 2733.</p> <p>5.1.7 Dried aquatic products of animal origin Should comply with the provisions of GB 10144.</p> <p>5.1.8 Salt for food use Should comply with the provisions of GB5461.</p> <p>5.1.9 Soy sauce Should comply with the provisions of GB2717.</p> <p>5.1.10 Edible vegetable oil Should comply with the provisions of GB 2716.</p> <p>5.1.11 Other Other raw and auxiliary materials shall comply with the provisions of the relevant national standards</p>	<p>DIRECTIVE (EU) 2020/2184 on the quality of water intended for human consumption. Regulation 852/2004 (consolidated)</p> <p>Regulation 853/2004 (consolidated)</p> <p>Regulation 853/2004 (consolidated)</p> <p>Regulation 852/2004</p> <p>Regulation 853/2004 (consolidated)</p> <p>Regulation 853/2004 (consolidated)</p> <p>Regulation 852/2004 (consolidated) Regulation 2018/848 ?</p> <p>Regulation 852/2004 (consolidated)</p> <p>Regulation 852/2004 (consolidated)</p> <p>Regulation 852/2004 (consolidated)</p>	



Chinese National Standard GBT 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation																																				
<p>5.2 Sensory requirements Should comply with the provisions of Table 1.</p> <p>Table 1 Sensory requirements</p> <table border="1" data-bbox="125 376 857 612"> <thead> <tr> <th>Item</th> <th>Requirement</th> </tr> </thead> <tbody> <tr> <td>Appearance</td> <td>The appearance of the dumpling should be consistent, with a uniform shape and no leakage of filling.</td> </tr> <tr> <td>Colour and lustre</td> <td>The colour and lustre of the product</td> </tr> <tr> <td>Taste and smell</td> <td>Taste and smell as expected for the product, no off flavours</td> </tr> <tr> <td>Foreign matter</td> <td>No foreign matter visible to the naked eye on the outside or inside</td> </tr> </tbody> </table>	Item	Requirement	Appearance	The appearance of the dumpling should be consistent, with a uniform shape and no leakage of filling.	Colour and lustre	The colour and lustre of the product	Taste and smell	Taste and smell as expected for the product, no off flavours	Foreign matter	No foreign matter visible to the naked eye on the outside or inside	<p>While there are no specific requirements for sensory characteristics, as described, in EU legislation there is a general requirement that Odour, Colour and Taste must be:</p> <p><i>“Acceptable to consumers and no abnormal change”</i></p>	<p><i>In the absence of specific sensory requirements for the products in the scope of this standard, within the EU, it is envisaged that the applications of Good Manufacturing practices (GMP) and HACCP based procedures would address these sensory requirements.</i></p>																										
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<p>5.3 Physical and chemical indicators The physical and chemical indicators shall comply with the provisions of Table 2.</p> <table border="1" data-bbox="152 738 871 1197"> <thead> <tr> <th rowspan="2">Item</th> <th rowspan="2"></th> <th colspan="2">Indicator Standard</th> </tr> <tr> <th>Meat fillings</th> <th>Vegetarian stuffing</th> </tr> </thead> <tbody> <tr> <td>Water / (g/100g)</td> <td>≤</td> <td colspan="2">70</td> </tr> <tr> <td>Fat/ (g/100g)</td> <td>≤</td> <td>18</td> <td>--</td> </tr> <tr> <td>Protein^a / (g/100g)</td> <td>≥</td> <td>2.5</td> <td>--</td> </tr> <tr> <td>Aflatoxin B₁/ (µg/kg)</td> <td></td> <td colspan="2" rowspan="6">As specified in GB 19295</td> </tr> <tr> <td>Volatile salt nitrogen / (mg/100g)</td> <td></td> </tr> <tr> <td>Acid value (as fat) (KOH) / (mg/g)</td> <td></td> </tr> <tr> <td>Peroxide value (as fat) / (g/100g)</td> <td></td> </tr> <tr> <td>Lead (as Pb) / (mg/kg)</td> <td></td> </tr> <tr> <td>Total arsenic (as As) / (mg/kg)</td> <td></td> </tr> <tr> <td colspan="4">^a The filling is used as the test sample.</td> </tr> </tbody> </table> <p>GB19295</p>	Item		Indicator Standard		Meat fillings	Vegetarian stuffing	Water / (g/100g)	≤	70		Fat/ (g/100g)	≤	18	--	Protein ^a / (g/100g)	≥	2.5	--	Aflatoxin B ₁ / (µg/kg)		As specified in GB 19295		Volatile salt nitrogen / (mg/100g)		Acid value (as fat) (KOH) / (mg/g)		Peroxide value (as fat) / (g/100g)		Lead (as Pb) / (mg/kg)		Total arsenic (as As) / (mg/kg)		^a The filling is used as the test sample.				<p>There are no equivalent tables in food hygiene legislation in the EU. EU Regulation 1169/2011 on the provision of information to consumers lays down rules for the declaration of added water, protein and fat thus requiring these nutrients to be quantified.</p> <p>EU Regulation 2023/915 on contaminants in foods sets levels for Aflatoxins, lead and arsenic. Acid value, peroxide value and volatile salt nitrogen would be governed by good manufacturing practices, industry standards and HACCP based procedures.</p>	<p><i>The Food Business Operator should ensure the final product complies with the physical and chemical requirements of the standard.</i></p>
Item				Indicator Standard																																		
	Meat fillings	Vegetarian stuffing																																				
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Chinese National Standard GBT 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation						
<p>5.4 Microbiological indicators The total number of bacteria, coliform, pathogenic bacteria (Salmonella, Shigella, Staphylococcus aureus) and mould count shall comply with the provisions of GB 19295.</p>	<p>EU Reg 2073/2005 would apply. The nature on the products used in the manufacture of the end product and its final categorisation under EU legislation will determine the applicable microbiological limits</p>	<p><i>Dumplings are not specifically mentioned in the Chinese standard on pathogenic organisms in food products. However, the limit of pathogen would be influenced by the type of filling used and, as such, the food business operator in the EU should take account of the limits set in the standard. The table in the standard GB 19295 is attached in page 27 under for convenience and clarity.</i></p>						
<p>5.5 Food additives 5.5.1 The quality of food additives shall conform to the corresponding standards and relevant regulations. 5.5.2 The scope of use and the amount of food additives used shall comply with the provisions of GB 2760.</p>	<p>Regulation (EC) No 1333/2008, Article 4 1. Only food additives included in the Community list in Annex II may be placed on the market as such and used in foods under the conditions of use specified therein.</p>	<p><i>Some food additives mentioned in the Chinese National Standard are not approved in the EU while some EU approved additives are not mentioned in the Chinese National Standards. EU food business operators must ensure that only additives approved by Chinese Standards are used in products exported to China</i></p>						
<p>5.6 Filling content Should comply with the provisions of Table 3. Table 3 Filling content</p> <table border="1" data-bbox="192 879 864 967"> <thead> <tr> <th>Item</th> <th>Indicator</th> <th>Standard</th> </tr> </thead> <tbody> <tr> <td>Filling content / (g/100g)</td> <td>≥</td> <td>35</td> </tr> </tbody> </table>	Item	Indicator	Standard	Filling content / (g/100g)	≥	35	<p>No equivalent legislation under EU food hygiene legislation. However, under labelling legislation (Regulation 1169/2011) this may have to be declared under ingredients?</p>	<p><i>Food business operators should take note of the minimum filling content of frozen dumplings.</i></p>
Item	Indicator	Standard						
Filling content / (g/100g)	≥	35						
<p>5.7 Net content Should comply with the "supervision and management of quantitative packaging commodity measurement" provisions.</p>	<p>Directive 2007/45/EC Of the European Parliament and of the Council of 5 September 2007 laying down rules on nominal quantities for prepacked products, repealing Council Directives 75/106/EEC and 80/232/EEC, and amending Council Directive 76/211/EEC</p> <p>Council Directive 76/211/EEC</p>							



Chinese National Standard GBT 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation
<p>6 Test methods</p> <p>6.1 Sensory requirements</p> <p>In the frozen state, take out a bag of samples, placed in a clean white porcelain plate, according to the provisions of Table 1, with visual inspection of the appearance, colour and lustre, and then cooked according to the cooking method marked on the package, with oral taste, nose and visual inspection of its sensory requirements.</p>	<p>No equivalent EU legislation in the sphere of food hygiene.</p>	<p><i>Sensory evaluation would form part of good manufacturing practices and HACCP based procedures in the EU</i></p>
<p>6.2 Physical and chemical indicators</p> <p>6.2.1 Moisture content</p> <p>Determined according to the method specified in GB/T 5009.3.</p> <p>6.2.2 Fat</p> <p>Determination according to the method specified in GB/T 5009.6.</p> <p>6.2.3 Protein</p> <p>Determination by the method specified in GB / T 5009.5.</p> <p>6.2.4 Total arsenic</p> <p>Determined by the method specified in GB / T 5009.11.</p> <p>6.2.5 Lead</p> <p>Determination by the method specified in GB / T 5009.12.</p> <p>6.2.6 Aflatoxin B1</p> <p>Determined by the method specified in GB/T 5009.22.</p> <p>6.2.7 Volatile salt nitrogen</p> <p>Determined by the method specified in GB/T 5009.44.</p> <p>6.2.8 Peroxide value, acid value</p> <p>Determined by the method specified in GB/T 5009.56.</p>	<p>EU Regulation 1169/2011 on the provision of information to consumers lays down rules for the declaration of moisture, protein and fat thus requiring these nutrients to be quantified.</p> <p>ISO standardised methods</p> <p>ISO standardised methods</p> <p>The sampling and the analysis for the official control of the maximum levels specified in the Annex to Regulation 1881/2006 amended by EU Regulation 2023/915.</p> <p>shall be performed in accordance with Commission Regulations (EC) No 1882/2006 (1), No 401/2006 (2), No 1883/2006 (3) and Commission Directives 2001/22/EC (4), 2004/16/EC (5) and 2005/10/EC (6).</p> <p>Only specified for fishery products in EU hygiene legislation</p> <p>Consolidated text: Commission Regulation (EEC) No 2568/91 of 11 July 1991 on the characteristics of olive oil and olive-residue oil and on the relevant methods of analysis</p>	



Chinese National Standard GBT 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation
Chinese National Standard GBT 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation
<p>6.3 Microorganisms</p> <p>6.3.1 Total number of bacteria Determination according to the method specified in GB/T 4789.2.</p> <p>6.3.2 Coliform Detected according to the method specified in GB / T 4789.3.</p> <p>6.3.3 Salmonella Detected according to the method specified in GB/T 4789.4.</p> <p>6.3.4 Staphylococcus aureus Detected according to the method specified in GB / T 4789.10.</p> <p>6.3.5 Shigella Tested according to the method specified in GB/T 4789.5.</p> <p>6.3.6 Moulds Detected according to the method specified in GB/T 4789.15.</p>	<p>Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs (2) lays down microbiological criteria for certain micro-organisms and the implementing rules to be complied with by food business operators when implementing the general and specific hygiene measures referred to in Article 4 of Regulation (EC) No 852/2004.</p>	<p><i>Microbiological levels in food which are not mandated in 2073/2005 would be governed by the application of GMP and HACCP procedures in EU production.</i></p> <p><i>Trade in food products should comply with established parameters which are based on HACCP principles</i></p>
<p>6.4 Filling content Determined according to the provisions of Appendix A.</p>		



Chinese National Standard GB/T 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation																										
<p>6.5 Net content Test according to the provisions of JJF 1070.</p>	<p>COUNCIL DIRECTIVE 76/211 of 20 January 1976 which was last amended in 2019 (2019/1243) on the approximation of the laws of the Member States relating to the making-up by weight or by volume of certain prepackaged products.</p> <p>This Directive relates to prepackages containing products intended for sale in constant unit nominal quantities which are:</p> <ul style="list-style-type: none"> - equal to values predetermined by the packer, - expressed in units of weight or volume, - not less than 5 g or 5 ml and not more than 10 kg or 10 l. <p>Prepackages covered by this Directive shall be made up in such a way that the completed packages satisfy the following requirements:</p> <ul style="list-style-type: none"> - the actual contents shall not be less, on average, than the nominal quantity; - the proportion of prepackages having a negative error greater than the tolerable negative error laid down in 2.4 shall be sufficiently small for batches of prepackages to satisfy the requirements of the tests specified in Annex II; - 1no prepackage having a negative error greater than twice the tolerable negative error given in the table in 2.4 may bear the EEC sign provided for in 3.3. <p>The tolerable negative error in the contents of a prepackage is fixed in accordance with the first table below while the non-destructive testing shall be carried out in accordance with a double sampling plan as shown in the second table below:</p> <table border="1" data-bbox="790 975 1507 1377"> <thead> <tr> <th rowspan="2">Nominal quantity Qn in grams or millilitres</th> <th colspan="2">Tolerable negative error</th> </tr> <tr> <th>as % of Qn</th> <th>g or ml</th> </tr> </thead> <tbody> <tr> <td>5 to 50</td> <td>9</td> <td>—</td> </tr> <tr> <td>from 50 to 100</td> <td>—</td> <td>4.5</td> </tr> <tr> <td>from 100 to 200</td> <td>4.5</td> <td>—</td> </tr> <tr> <td>from 200 to 300</td> <td>—</td> <td>9</td> </tr> <tr> <td>from 300 to 500</td> <td>3</td> <td>—</td> </tr> <tr> <td>from 500 to 1 000</td> <td>—</td> <td>15</td> </tr> <tr> <td>from 1 000 to 10 000</td> <td>1.5</td> <td>—</td> </tr> </tbody> </table> <p>(76/211/EEC)</p>	Nominal quantity Qn in grams or millilitres	Tolerable negative error		as % of Qn	g or ml	5 to 50	9	—	from 50 to 100	—	4.5	from 100 to 200	4.5	—	from 200 to 300	—	9	from 300 to 500	3	—	from 500 to 1 000	—	15	from 1 000 to 10 000	1.5	—	<p><i>The rules specified in the EU legislation are broadly equivalent to those required of the standard.</i></p>
Nominal quantity Qn in grams or millilitres	Tolerable negative error																											
	as % of Qn	g or ml																										
5 to 50	9	—																										
from 50 to 100	—	4.5																										
from 100 to 200	4.5	—																										
from 200 to 300	—	9																										
from 300 to 500	3	—																										
from 500 to 1 000	—	15																										
from 1 000 to 10 000	1.5	—																										



Chinese National Standard GBT 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation																																												
	<p>The consolidated version of Council Directive 80/181/EEC on the approximation of the laws of the Member States relating to units of measurement and on the repeal of Directive 71/354/EEC lists and defines the legal units that must be used to express quantities in the European Union (EU).</p> <p>It specifies that the metric units of measurement / International System of Units (SI units)* are applicable in the EU.</p> <p>SI units are mandatory in the EU for economic, public-health, public-safety and administrative purposes.</p> <table border="1" data-bbox="676 544 1760 959"> <thead> <tr> <th rowspan="2">Number in batch</th> <th colspan="3">Samples</th> <th colspan="2">Number of defective units</th> </tr> <tr> <th>Order</th> <th>Number</th> <th>Aggregate number</th> <th>Acceptance criterion</th> <th>Rejection criterion</th> </tr> </thead> <tbody> <tr> <td rowspan="2">100 to 500</td> <td>1st</td> <td>30</td> <td>30</td> <td>1</td> <td>3</td> </tr> <tr> <td>2nd</td> <td>30</td> <td>60</td> <td>4</td> <td>5</td> </tr> <tr> <td rowspan="2">501 to 3 200</td> <td>1st</td> <td>50</td> <td>50</td> <td>2</td> <td>5</td> </tr> <tr> <td>2nd</td> <td>50</td> <td>100</td> <td>6</td> <td>7</td> </tr> <tr> <td rowspan="2">3 201 and over</td> <td>1st</td> <td>80</td> <td>80</td> <td>3</td> <td>7</td> </tr> <tr> <td>2nd</td> <td>80</td> <td>160</td> <td>8</td> <td>9</td> </tr> </tbody> </table>	Number in batch	Samples			Number of defective units		Order	Number	Aggregate number	Acceptance criterion	Rejection criterion	100 to 500	1st	30	30	1	3	2nd	30	60	4	5	501 to 3 200	1st	50	50	2	5	2nd	50	100	6	7	3 201 and over	1st	80	80	3	7	2nd	80	160	8	9	
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Chinese National Standard GB/T 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation
<p>7 Inspection rules</p> <p>7.1 Group batch</p> <p>The same shift, the same species, the same specification, the same production line as a batch of products.</p>	<p>As defined in Regulation 2073/2005</p> <p>'batch' means a group or set of identifiable products obtained from a given process under practically identical circumstances and produced in a given place within one defined production period;</p>	
<p>7.2 Sampling</p> <p>According to the relevant provisions of GB/T 2828.1.</p>		
<p>7.3 Factory inspection</p> <p>Inspection items: sensory requirements, net content, filling content, peroxide value, volatile salt nitrogen and total number of bacteria and coliform.</p>	<p>Regulation (EC) No 852/2004 Article 5</p> <p>The verification of effective self-controls is a key objective of official controls in food establishments:</p>	
<p>7.4 Type test</p> <p>7.4.1 A type test shall be carried out every six months during normal production. The type test shall also be carried out when one of the following conditions exists.</p> <p>(a) new product trial identification.</p> <p>(b) officially put into production, such as raw materials, production processes have changed significantly, may affect product quality.</p> <p>(c) the product is discontinued for more than six months, when resuming production.</p> <p>(d) test results and the previous test results have significant differences.</p> <p>(e) when the national quality supervision department requirements.</p>	<p>Regulation (EC) No 852/2004, Article 5</p> <p>(f) establishing procedures, which shall be carried out regularly, to verify that the measures outlined in subparagraphs (a) to (e) are working effectively;</p> <p>a) identifying any hazards that must be prevented, eliminated or reduced to acceptable levels;</p> <p>(b) identifying the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels;</p> <p>(c) establishing critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards;</p> <p>(d) establishing and implementing effective monitoring procedures at critical control points;</p> <p>(e) establishing corrective actions when monitoring indicates that a critical control point is not under control;</p> <p>The verification of effective self-controls is a key objective of official controls in food establishments:</p>	



Chinese National Standard GB/T 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation
<p>7.4.2 Type inspection items This standard 5.2, 5.3, 5.4, 5.5, 5.6 and 5.7 of the items specified.</p>	<p>Regulation (EU) 2017/625, Article 14 Official control methods and techniques shall include the following as appropriate:</p> <ul style="list-style-type: none"> (a) an examination of the controls that operators have put in place and of the results obtained; (b) an inspection of: <ul style="list-style-type: none"> (i) equipment, means of transport, premises and other places under their control and their surroundings; (ii) animals and goods, including semi-finished goods, raw materials, ingredients, processing aids and other products used for the preparation and production of goods or for feeding or treating animals; (iii) cleaning and maintenance products and processes; (iv) traceability, labelling, presentation, advertising, and relevant packaging materials including materials intended to come into contact with food; (c) controls on the hygiene conditions in the operators' premises; (d) an assessment of procedures on good manufacturing practices, good hygiene practices, good farming practices, and of procedures based on the principles of hazard analysis critical control points (HACCP); (e) an examination of documents, traceability records and other records which may be relevant to the assessment of compliance with the rules referred to in Article 1(2), including, where appropriate, documents accompanying food, feed and any substance or material entering or leaving an establishment; (f) interviews with operators and with their staff; (g) the verification of measurements taken by the operator and other test results; (h) sampling, analysis, diagnosis, and tests; (i) audits of operators; (j) any other activity required to identify cases of non-compliance. 	
<p>8 Judgement rules 8.1 Factory inspection rules 8.1.1 The factory inspection items all meet the standard and are judged as qualified products. 8.1.2 If one of the factory inspection items (except microbiological items) does not meet the standard, the sample can be doubled in the sampling batch for retesting, and if it still does not meet the</p>	<p>Regulation (EC) No 852/2004, Article 5</p> <ul style="list-style-type: none"> (f) establishing procedures, which shall be carried out regularly, to verify that the measures outlined in subparagraphs (a) to (e) are working effectively; (a) identifying any hazards that must be prevented, eliminated or reduced to acceptable levels; (b) identifying the critical control points at the step or steps at which control is essential to prevent or eliminate a hazard or to reduce it to acceptable levels; (c) establishing critical limits at critical control points which separate acceptability from unacceptability for the prevention, elimination or reduction of identified hazards; (d) establishing and implementing effective monitoring procedures at critical control points; 	



Chinese National Standard GBT 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation
<p>standard after retesting, it is judged as unqualified products.</p>	<p>(e) establishing corrective actions when monitoring indicates that a critical control point is not under control;</p>	
<p>8.1.3 If one microbiological item does not meet the standard, it will be judged as unqualified and will not be retested.</p>	<p>The verification of effective self-controls is a key objective of official controls in food establishments: Regulation (EU) 2017/625, Article 14</p>	
<p>8.2 Type test determination</p>	<p>Official control methods and techniques shall include the following as appropriate:</p>	
<p>8.2.1 If all the items in the type test are qualified, the product is judged as qualified.</p>	<p>(a) an examination of the controls that operators have put in place and of the results obtained;</p>	
<p>8.2.2 In addition to microbiology, type test items not more than two do not meet the standard, you can double the sample retest. After retesting, there is still a failure to meet this standard, the batch of products is judged to be unqualified.</p>	<p>(b) an inspection of:</p>	
<p>8.2.3 More than two or one microbiological test does not comply with this standard, the batch of products shall be judged as unqualified.</p>	<p>(i) equipment, means of transport, premises and other places under their control and their surroundings;</p>	
	<p>(ii) animals and goods, including semi-finished goods, raw materials, ingredients, processing aids and other products used for the preparation and production of goods or for feeding or treating animals;</p>	
	<p>(iii) cleaning and maintenance products and processes;</p>	
	<p>(iv) traceability, labelling, presentation, advertising, and relevant packaging materials including materials intended to come into contact with food;</p>	
	<p>(c) controls on the hygiene conditions in the operators' premises;</p>	
	<p>(d) an assessment of procedures on good manufacturing practices, good hygiene practices, good farming practices, and of procedures based on the principles of hazard analysis critical control points (HACCP);</p>	
	<p>(e) an examination of documents, traceability records and other records which may be relevant to the assessment of compliance with the rules referred to in Article 1(2), including, where appropriate, documents accompanying food, feed and any substance or material entering or leaving an establishment;</p>	
<p>(f) interviews with operators and with their staff;</p>	<p>(g) the verification of measurements taken by the operator and other test results;</p>	
<p>(h) sampling, analysis, diagnosis, and tests;</p>	<p>(i) audits of operators;</p>	



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<p>9 Production and processing process hygiene requirements</p> <p>Should comply with the provisions of GB 14881 and other relevant health requirements.</p>	<p>The requirements for production and processing hygiene are laid down in</p> <p>EU Regulation 852/2004 EU Regulation 853/2004</p>	<p><i>The European Union has adopted legislation to ensure the safety of food placed on the market in EU member countries. This legislation sets general hygienic requirements for food production based on the good manufacturing practice and the HACCP system. The criteria for microorganisms, chemicals, and applicable food additives are set. Also, the legislation contains requirements for product labelling.</i></p>
<p>10 Labelling, labelling, packaging</p> <p>10.1 Labelling and labelling</p> <p>10.1.1 Product pre-packaging labelling should comply with GB7718 and "food labelling regulations" provisions, and should also be marked with the method of consumption, QS mark, frozen raw products or frozen cooked products, filling content, etc.</p> <p>10.1.2 The outer box markings should comply with the provisions of GB/T191, and should also be marked: QS mark, storage conditions, shelf life, production date and telephone, etc.</p>	<p>The EU Food Information to Consumers Regulation No 1169/2011 (FIC) covers the general food labelling and nutrition information requirements for pre-packed foods. General food labelling includes areas such as the name of the food, ingredients lists and allergen information.</p> <p>Annex VI Part A point 1</p> <p>The name of the food shall include or be accompanied by particulars as to the physical condition of the food or the specific treatment which it has undergone (for example, powdered, refrozen, freeze-dried, quick-frozen, concentrated, smoked) in all cases where omission of such information could mislead the purchaser.</p>	<p><i>The Food Business Operator should apply the requirements of EU labelling legislation but should also ensure additional requirements for indicating the method of consumption, QS mark, frozen raw products or frozen cooked products, filling content are clearly visible on the product label.</i></p>



Chinese National Standard GBT 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation
<p>10.2 Packaging</p> <p>10.2.1 Inner packaging materials should comply with GB 9683, GB 9687, GB 9688, GB 9689, GB/T 10005, GB/T 12025 and other relevant provisions.</p> <p>10.2.2 The outer packaging box shall comply with the provisions of the relevant standards.</p> <p>10.2.3 The product packaging shall be tightly packed, sturdily tied, free from damage and pollution, and the packaging shall be consistent with the contents.</p>	<p>Regulation (EC) No 852/2004, Annex II, Chapter X,</p> <ol style="list-style-type: none"> 1. Material used for wrapping and packaging are not to be a source of contamination. 2. Wrapping materials are to be stored in such a manner that they are not exposed to a risk of contamination. 3. Wrapping and packaging operations are to be carried out so as to avoid contamination of the products. 	<p><i>Equivalent</i></p>
<p>11 Transport and storage</p> <p>11.1 Transport</p> <p>11.1.1 The product shall be transported in a means of transport at a temperature of -15°C and below.</p> <p>11.1.2 The means of transport shall be clean and hygienic and shall not be mixed with toxic, harmful, corrosive, volatile, odorous or other articles that affect the quality of the product.</p> <p>11.1.3 The product should be handled gently and should not be thrown, hit or crushed.</p>	<p>Regulation (EC) No 852/2004, Annex II, Chapter IV</p> <p>Conveyances and/or containers used for transporting foodstuffs are to be kept clean and maintained in good repair and condition to protect foodstuffs from contamination and are, where necessary, to be designed and constructed to permit adequate cleaning and/or disinfection.</p> <ol style="list-style-type: none"> 2. Receptacles in vehicles and/or containers are not to be used for transporting anything other than foodstuffs where this may result in contamination. 3. Where conveyances and/or containers are used for transporting anything in addition to foodstuffs or for transporting different foodstuffs at the same time, there is, where necessary, to be effective separation of products. 4. Bulk foodstuffs in liquid, granulate or powder form are to be transported in receptacles and/or containers/tankers reserved for the transport of foodstuffs. Such containers are to be marked in a clearly visible and indelible fashion, in one or more Community languages, to show that they are used for the transport of foodstuffs, or are to be marked 'for foodstuffs only'. 5. Where conveyances and/or containers have been used for transporting anything other than foodstuffs or for transporting different foodstuffs, there is to be effective cleaning between loads to avoid the risk of contamination. 6. Foodstuffs in conveyances and/or containers are to be so placed and protected as to minimise the risk of contamination. 7. Where necessary, conveyances and/or containers used for transporting foodstuffs are to be capable of maintaining foodstuffs at appropriate temperatures and allow those temperatures to be monitored. 	<p><i>Equivalent</i></p>



Chinese National Standard GBT 23786-2009 Quick-frozen dumpling	EU legislation	Implementing rules and comparative evaluation
<p>11.2 Storage</p> <p>11.2.1 The product should be stored at -18°C and below. Temperature fluctuations should be controlled to within 2°C.</p> <p>11.2.2 The product shall not be stored with toxic, harmful, odorous, corrosive or volatile substances or other substances that affect the quality of the product during storage.</p>	<p>Regulation (EC) No 852/2004, Annex II, Chapter IX</p> <p>2. Raw materials and all ingredients stored in a food business are to be kept in appropriate conditions designed to prevent harmful deterioration and protect them from contamination.</p> <p>3. At all stages of production, processing and distribution, food is to be protected against any contamination likely to render the food unfit for human consumption, injurious to health</p>	
<p>12 Sale</p> <p>The product shall be sold pre-packaged under refrigerated conditions and the temperature in the low temperature display cabinet shall be maintained at -15°C or below.</p>	<p>Regulation (EC) No 852/2004, Annex II, Chapter IX point 5</p> <p>Raw materials, ingredients, intermediate products and finished products likely to support the reproduction of pathogenic micro-organisms or the formation of toxins are not to be kept at temperatures that might result in a risk to health. The cold chain is not to be interrupted. However, limited periods outside temperature control are permitted, to accommodate the practicalities of handling during preparation, transport, storage, display and service of food, provided that it does not result in a risk to health.</p> <p>Food businesses manufacturing, handling and wrapping processed foodstuffs are to have suitable rooms, large enough for the separate storage of raw materials from processed material and sufficient separate refrigerated storage.</p>	<p><i>Food business operators should note the temperature requirements.</i></p>
<p>13 Recalls</p> <p>Should comply with the Food Recall Management Regulations.</p>	<p>REGULATION (EC) No 178/2002 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety.</p> <p>Art 19.</p> <p>Responsibilities for food: food business operators</p> <p>1. If a food business operator considers or has reason to believe that a food which it has imported, produced, processed, manufactured or distributed is not in compliance with the food safety requirements, it shall immediately initiate procedures to withdraw the food in question from the market where the food has left the immediate control of that initial food business operator and inform the competent authorities thereof. Where the product may have reached the consumer, the operator shall effectively and accurately inform the consumers of the reason for its withdrawal, and if necessary, recall from consumers products already supplied to them when other measures are not sufficient to achieve a high level of health protection.</p>	<p><i>Equivalent</i></p>



GB19295 List of pathogens limits

Food category	Pathogen Index	Sampling plan and limit (if not specified, is / 25 g or / 25 ml)				Test Method	Note
		n	c	n	M		
Meat Products - cooked meat products - ready to eat raw meat products	salmonella	5	0	0	-	GB 4789.4	-
	Listeria monocytogenes bacteria	5	0	0	-	GB 4789.30	
	Staphylococcus aureus	5	1	100cfu/g	1000cfu/g	GB 4789.1 Method Two	
	Escherichia coli O157:H7	5	0	0	-	GB 4789.36	
Aquatic Products - cooked aquatic products - ready to eat raw aquatic products - ready to eat algae products	salmonella	5	0	0	-	GB 4789.4	-
	Vibrio parahaemolyticus	5	1	100 MPN/g	1000 MPN/g	GB/T 4789.7	
	Staphylococcus aureus	5	1	100 cfu/g	1000cfu/g	GB 4789.10 Method Two	
Ready to eat Egg Products	Salmonella	5	0	0	-	GB 4789.4	-
Grain Food - cooked grain food (inc. baked) - cooked wheat /rice products with stuffing (materials) - Instant wheat / rice products	Salmonella	5	0	0	-	GB 4789.4	-
	Staphylococcus aureus	5	1	100 cfu/g	1000cfu/g	GB 4789.10 Method Two	



GB19295 List of pathogens limits

Food category	Pathogen Index	Sampling plan and limit (if not specified, is / 25 g or / 25 ml)				Test Method	Note
		n	c	n	M		
Ready to eat Bean Products - Fermented bean products - Nonfermented bean products	Salmonella	5	0	0	-	GB 4789.4	-
	Staphylococcus aureus	5	1	100 cfu/g	1000cfu/g	GB 4789.10 Method Two	
Chocolate and Cocoa	Salmonella	5	0	0	-	GB 4789.4	
Ready to eat fruit and vegetable products (inc. sauce pickled / pickled vegetables)	Salmonella	5	0	0	-	GB 4789.4	-
	Staphylococcus aureus	5	1	100 cfu/g	1000cfu/g	GB 4789.10 Method Two	
	Escherichia coli O157:H7	5	0	0	-	GB 4789.36	Applied to beef meat Product only
Drinks (exc. packed drinking water and carbonated drinks)	Salmonella	5	0	0	-	GB 4789.4	
	Staphylococcus aureus	5	1	100 cfu/g	1000cfu/g	GB 4789.10 Method Two	
Frozen Drinks - Ice cream - Ice cream bars (icefrost) - Edible ice / ice lolly	Salmonella	5	0	0	-	GB 4789.4	
	Staphylococcus aureus	5	1	100 cfu/g	1000cfu/g	GB 4789.10 Method Two	
Ready to eat Flavourings - Soy sauce - Paste and paste products - spices of seafood - Composite seasonings (salad dressings)	Salmonella	5	0	0	-	GB 4789.4	-
	Staphylococcus aureus	5	1	100 cfu/g	1000cfu/g	GB 4789.10 Method Two	
	Vibrio parahaemolyticus	5	1	100 MPN/g(mL)	1000 MPN/g(mL)	GB/T4789.7	Applicable to spices of seafood only
Nut Seed Products - Smashed nuts or seeds (paste) - Pickled nuts	Salmonella	5	0	0	-	GB 4789.4	



2.2 Chinese Food Safety Standard GB/T 21270-2007 Filling of foods

Chinese National Standard GB/T 21270-2007 Filling of foods	EU legislation	Implementing rules and comparative evaluation
<p>Scope This standard specifies terms and definitions, product classification, requirements, test methods, inspection rules, determination principles and labelling relating to food fillings. This standard applies to the production, sale and inspection of products that meet the definition in 3.1.</p>	<p>There is no single regulation in the EU which captures the range of items under the scope of this standard. Instead the scope would be addressed over a number of regulations e.g. Reg 178/2002 Reg 852/2004 Reg 853/2004 Reg 1169/2011 ISO testing protocols.</p>	<p><i>The European Union has adopted legislation to ensure the safety of food placed on the market in EU member countries. This legislation sets general hygienic requirements for food production based on the good manufacturing practice and the HACCP system. The criteria for microorganisms, chemicals, and applicable food additives are set. Also, the legislation contains requirements for product labelling.</i></p>
<p>3 Terminology and definitions 3.1 Filling of foods Products made from fruits or tubers of plants, meat products of livestock and poultry, aquatic products, etc., with or without sugar, with or without other auxiliary ingredients, heated, sterilised and packed. 3.2 Ooze water The phenomenon of liquid oozing from the filling. 3.3 Crystallization The appearance of hard white spots or lumps in the filling. 3.4 Cold chain A system of continuous cold storage of perishable foodstuffs from production to consumption</p>	<p>No equivalent definition in EU legislation. Depending on the fillings used some of the end products would fall under the definition of meat preparations.</p> <p>No equivalent definition in EU legislation</p> <p>No equivalent definition in EU legislation</p> <p>No equivalent definition in EU legislation. However, Art 4.3 (d) of EU Reg. 852/2004, states that Food business operators shall, as appropriate, adopt specific hygiene measures such as maintenance of cold chain. Furthermore under Chapter IX point 5 of the same regulation it states “Raw materials, ingredients, intermediate products and finished products likely to support the reproduction of pathogenic micro-organisms or the formation of toxins are not to be kept at temperatures that might result in a</p>	<p><i>Many guides to good practice have been developed both as Community guides as well as National guides by each Member State.</i></p> <p><i>In these guides requirements are explained in detail to enable application in that sector using simplified language and examples.</i></p>



Chinese National Standard GB/T 21270-2007 Filling of foods	EU legislation	Implementing rules and comparative evaluation
	<p>risk to health. The cold chain is not to be interrupted. However, limited periods outside temperature control are permitted, to accommodate the practicalities of handling during preparation, transport, storage, display and service of food, provided that it does not result in a risk to health. Food businesses manufacturing, handling and wrapping processed foodstuffs are to have suitable rooms, large enough for the separate storage of raw materials from processed material and sufficient separate refrigerated storage”.</p> <p>Annex III, Section IX, Chapter II, B. 3 of Regulation 853/2004 states that “During transport the cold chain must be maintained and, on arrival at the establishment of destination, the temperature of the milk and the colostrum must not be more than 10 o C.”</p>	
<p>4 Product classification</p> <p>4.1 Classification by application</p> <p>4.1.1 Bakery fillings: Food fillings mainly used in the production of baked goods such as pastries, bread and mooncakes.</p> <p>4.1.2 Frozen beverages fillings: mainly used as food fillings for making frozen beverages such as ice cream, sorbet and ices.</p> <p>4.1.3 Frozen food fillings: mainly used to make frozen food (e.g. frozen bean paste buns, frozen dumplings, etc.) food fillings.</p> <p>4.2 Classification by process</p> <p>4.2.1 Ambient temperature preserved fillings: sterilised at high temperature and preserved at room temperature.</p> <p>4.2.2 Cold chain preserved fillings: low temperature (or high temperature) sterilisation, cold chain preservation.</p> <p>4.3 Classification by raw material</p> <p>There are 6 categories, see Appendix A</p>	<p>In EU legislation the classification of such products would depend on the nature of the filling used whether it be products of plant origin or products of animal origin or a combination of both.</p> <p>Accordingly, legislation governing the production of such products would apply.</p> <p>Broadly speaking Regulation 852/2004 and Reg 853/2004 (products of animal origin) would be the main legal instruments.</p> <p>Canning and the production of high temperature short time dairy products would be considered as equivalent processes.</p> <p>Processes requiring the end product to be stored under chilled or frozen conditions.</p> <p>See comments in the section under</p>	



Chinese National Standard GB/T 21270-2007 Filling of foods	EU legislation	Implementing rules and comparative evaluation
<p>5 Requirements</p> <p>5.1 Raw and auxiliary material requirements</p> <p>5.1.1 White sugar: should comply with the provisions of GB317.</p> <p>5.1.2 Maltose syrup (caramel): should comply with the provisions of QB/T 2347.</p> <p>5.1.3 Edible vegetable oil: should comply with the provisions of GB2716.</p> <p>5.1.4 preserves: should comply with the provisions of GB14884.</p> <p>5.1.5 Dried fruits: should comply with the provisions of GB16325.</p> <p>5.1.6 Sesame seeds: should comply with the provisions of GB/T11761.</p> <p>5.1.7 Other raw and auxiliary materials should conform to the provisions of relevant standards.</p>	<p>Council Directive 2001/111/EC relating to certain sugars intended for human consumption.</p> <p>Commission Regulation (EEC) No 2568/91 would be relevant for olive oil and olive-residue oil.</p> <p>Council Directive 2001/113/EC relating to fruit jams, jellies and marmalades and sweetened chestnut purée intended for human consumption.</p> <p>EU regulations on various aspects of dried fruits.</p> <p>No commodity specific hygiene regulations</p>	<p><i>The requirements for the various raw materials in this section are addressed in the documents under the relevant GB standards.</i></p> <p><i>These should be consulted in conjunction with this document when an evaluation of this standard is undertaken</i></p>



Chinese National Standard GB/T 21270-2007 Filling of foods	EU legislation	Implementing rules and comparative evaluation																
<p>5.2 Sensory requirements Sensory requirements for baked goods, frozen beverages and frozen food fillings should comply with the provisions of Table 1.</p> <p>Table 1 Sensory requirements</p> <table border="1" data-bbox="244 440 887 635"> <thead> <tr> <th>Item</th> <th>Requirements</th> </tr> </thead> <tbody> <tr> <td>Tissue form</td> <td>Fine, oily and moist</td> </tr> <tr> <td>Colour and lustre</td> <td>Normal</td> </tr> <tr> <td>Taste and texture</td> <td>Good taste, no off flavours</td> </tr> <tr> <td>Impurities</td> <td>No visible impurities with normal vision</td> </tr> </tbody> </table>	Item	Requirements	Tissue form	Fine, oily and moist	Colour and lustre	Normal	Taste and texture	Good taste, no off flavours	Impurities	No visible impurities with normal vision	<p>While there are no specific requirements for sensory characteristics in EU legislation there is a general requirement for Odour, Colour and Taste which must be: “Acceptable to consumers and no abnormal change”</p>	<p><i>Good manufacturing practices, HACCP protocols and standard operating procedures would govern these concepts under EU rules.</i></p>						
Item	Requirements																	
Tissue form	Fine, oily and moist																	
Colour and lustre	Normal																	
Taste and texture	Good taste, no off flavours																	
Impurities	No visible impurities with normal vision																	
<p>5.3 Physical and chemical indicators Should comply with the provisions of Table 2</p> <p>Table 2 Physical and chemical indicators</p> <table border="1" data-bbox="127 904 1016 1117"> <thead> <tr> <th>Item</th> <th>Filling for baked goods</th> <th>Frozen beverages with filling</th> <th>Frozen food fillings</th> </tr> </thead> <tbody> <tr> <td>Weight loss on drying/% ≤</td> <td>40</td> <td>68</td> <td>40</td> </tr> <tr> <td>Total sugar/% ≤</td> <td>60</td> <td>48</td> <td>48</td> </tr> <tr> <td>Fat/% ≤</td> <td>33</td> <td>28</td> <td>30</td> </tr> </tbody> </table>	Item	Filling for baked goods	Frozen beverages with filling	Frozen food fillings	Weight loss on drying/% ≤	40	68	40	Total sugar/% ≤	60	48	48	Fat/% ≤	33	28	30	<p>The food hygiene regulations, as a whole, do not contain an equivalent table for the physical and chemical indicators shown in the column to the left. Food information for consumers require manufacturers to declare the list of ingredients including sugar and fat in a product. Weight loss on drying would be governed by good manufacturing practices and standard operating procedures within the EU.</p>	<p><i>Manufacturers should take into consideration the maximum limits set in the table for all products which fall into the three categories mentioned i.e. fillings for baked goods, frozen beverage with fillings and frozen food fillings. The limits listed must not be exceeded and in accordance with FIC legislation should be clearly visible on the label of the finished product.</i></p>
Item	Filling for baked goods	Frozen beverages with filling	Frozen food fillings															
Weight loss on drying/% ≤	40	68	40															
Total sugar/% ≤	60	48	48															
Fat/% ≤	33	28	30															



Chinese National Standard GB/T 21270-2007 Filling of foods	EU legislation	Implementing rules and comparative evaluation
<p>5.4 Health indicators 5.4.1 Acid value, peroxide value, arsenic, lead, aflatoxin B1, copper, volatile salt nitrogen 5.4.1.1 Fillings for baked goods shall conform to the index requirements of GB7099. 5.4.1.2 Filling for frozen beverages should comply with the index requirements of GB2759.1. 5.4.1.3 Fillings for quick-frozen foods should meet the index requirements of GB19295.</p>	<p>EU Reg 1881/2006 setting maximum levels for certain contaminants in foodstuffs would be applicable for arsenic, lead, and aflatoxins. B1</p> <p>The acid value and peroxide value for various oils is set in a number of Commission Regulations e.g. Reg.2019/1604 on the characteristics of olive oil and olive-residue oil and on the relevant methods of analysis specifies the peroxide values for various grades of olive oil.</p> <p>Reg 2021/1319 authorising changes in the specifications of the novel food Coriander seed oil from <i>Coriandrum sativum</i> and amending Implementing Regulation (EU) 2017/2470 sets a peroxide value ≤ 5.0 mg/kg</p>	<p><i>The requirements for the various health indicators in this section are addressed in the documents under the relevant GB standards.</i></p> <p><i>These should be consulted in conjunction with this document when an evaluation of this standard is undertaken</i></p>
<p>5.4.2 Microbiological indicators 5.4.2.1 Room temperature preserved fillings shall comply with the requirements of GB7099 "Hot processing".</p> <p>5.4.2.2 Cold chain preserved fillings shall comply with the requirements of GB19295 "Cooked".</p>	<p>EU Reg 2073/2005 would apply.</p> <p>The nature on the products used in the manufacture of the end product and its final categorisation under EU legislation will determine the applicable microbiological limits.</p>	<p><i>Food business operators must ensure that the microbiological limits set in the Chinese standards are adhered to for the product category in question.</i></p>
<p>5.5 Food additives In accordance with the provisions of GB2760.</p>	<p>EU Regulation 1333/2008 set down the maximum limits of food additives which are permitted, by food category.</p> <p>A comparative table by food filling is provided under.</p>	<p><i>Some food additives mentioned in the Chinese National Standard are not approved in the EU while some EU approved additives are not mentioned in the Chinese National Standards.</i></p> <p><i>EU food business operators must ensure that only additives approved by Chinese Standards are used in products exported to China.</i></p> <p><i>The limits applicable under the Chinese standard will therefore depend on the food fillings used in the manufacture of the end product.</i></p>



Chinese National Standard GB/T 21270-2007 Filling of foods	EU legislation	Implementing rules and comparative evaluation
<p>6 Test methods</p> <p>6.1 Sensory inspection Take a sample, remove the packaging, placed in a clean white porcelain plate, visual inspection of the form, colour and lustre, and then cut with a knife according to the quartering method to observe the internal organization, taste and standard provisions against the evaluation.</p> <p>6.2 Examination of physical and chemical indicators</p> <p>6.2.1 Drying weight loss test According to GB/T 5009.3-2003 in the direct drying method to determine.</p> <p>6.2.2 Test of fat Determination by acid hydrolysis method in accordance with GB/T 5009.6-2003.</p> <p>6.2.3 The test of total sugar Determination by the method specified in Appendix B.</p> <p>6.3 Examination of health indicators</p> <p>6.3.1 Acid value, peroxide value Determination according to the method specified in GB/T 5009.37.</p> <p>6.3.2 Arsenic Determination according to the method specified in GB/T 5009.11.</p> <p>6.3.3 Lead Determination by the method specified in GB/T 5009.12.</p> <p>6.3.4 Copper According to GB / T 5009.13 method of determination.</p> <p>6.3.5 Aflatoxin B1 Determined by the method specified in GB/T 5009.22.</p>	<p>No equivalent EU legislation in the sphere of food hygiene.</p> <p>ISO standardised methods</p> <p>EU Regulation 1169/2011 on the provision of information to consumers lays down rules for the declaration of moisture, protein and fat thus requiring these nutrients to be quantified.</p> <p>Consolidated text: Commission Regulation (EEC) No 2568/91 of 11 July 1991 on the characteristics of olive oil and olive-residue oil and on the relevant methods of analysis</p> <p>The sampling and the analysis for the official control of the maximum levels specified in the Annex to Regulation 1881/2006 shall be performed in accordance with Commission Regulations (EC) No 1882/2006 (1), No 401/2006 (2), No 1883/2006 (3) and Commission Directives 2001/22/EC (4), 2004/16/EC (5) and 2005/10/EC (6).</p>	<p><i>Food business operators should be cognisant of the maximum levels permitted under Chinese standards for the various parameters covered in this section.</i></p> <p><i>An ISO method for many of the parameters would exist under International and EU legislation.</i></p>
<p>6.4 Microbiological indicators test According to GB / T 4789.24 test method.</p>	<p>EU Reg. 2073/2005 lays down detailed rules regarding the microbiological criteria for foodstuffs. It specifies among other things, the type of test, the analytical methods, the number of samples, the frequency of testing (in some cases) and the interpretation of the results and subsequent corrective action(s), where necessary</p>	



Chinese National Standard GB/T 21270-2007 Filling of foods	EU legislation	Implementing rules and comparative evaluation												
<p>7 Inspection rules</p> <p>7.1 Factory inspection</p> <p>7.1.1 The product should be inspected by the factory inspection department batch by batch and issue a certificate of compliance.</p> <p>7.1.2 Factory inspection items include: sensory requirements, net content, total bacterial colony, coliform for each batch of products factory mandatory inspection items.</p>	<p>The word inspection under EU Regulations refers to the inspection of animals before and after slaughter. It is not used to convey oversight of a manufacturing process per se.</p> <p>The word examination is used in EU legislation (853/2004) for matters pertaining to sensory evaluation.</p>	<p><i>Food business operator (FBO) procedures in the context of product intake, sampling, and microbiological limits, as part of an overall HACCP programme, are used in the EU for those parameters under section 7.</i></p>												
<p>7.2 Type examination</p> <p>7.2.1 The type test shall include all items specified in Chapter 5. The type test shall be carried out every six months during normal production.</p> <p>7.2.2 The type test shall be carried out in one of the following cases.</p> <p>(a) new products when the trial identification.</p> <p>(b) officially put into production, such as raw materials, production processes have changed significantly, may affect product quality.</p> <p>(c) the product is discontinued for more than six months, when resuming production.</p> <p>(d) factory test results and the last type test have a large difference.</p> <p>(e) when the national quality supervision department requirements.</p> <p>7.2.3 Sampling method and quantity: the same day the same shift production of the same species for a batch. In the enterprise finished goods warehouse in the products to be sold in a random sampling. The number of pieces sampled is shown in Table 3.</p> <p>Table 3 Number of sampling pieces</p> <table border="1" data-bbox="125 1150 922 1406"> <thead> <tr> <th>Number of packaging pieces per batch of production (referring to the basic packaging boxes)</th> <th>Number of sampled pieces (referring to basic packing boxes)</th> </tr> </thead> <tbody> <tr> <td>200 (including 200) or less</td> <td>3</td> </tr> <tr> <td>201~800</td> <td>4</td> </tr> <tr> <td>801~1800</td> <td>5</td> </tr> <tr> <td>1801~3 200</td> <td>6</td> </tr> <tr> <td>3200 or above</td> <td>7</td> </tr> </tbody> </table>	Number of packaging pieces per batch of production (referring to the basic packaging boxes)	Number of sampled pieces (referring to basic packing boxes)	200 (including 200) or less	3	201~800	4	801~1800	5	1801~3 200	6	3200 or above	7	<p>Regulation (EC) No 852/2004, Article 5 (f) establishing procedures, which shall be carried out regularly, to verify that the measures outlined in subparagraphs (a) to (e) are working effectively;</p> <p>The verification of effective self-controls is a key objective of official controls in food establishments:</p> <p>Regulation (EU) 2017/625, Article 14 Official control methods and techniques shall include the following as appropriate:</p> <p>(a) an examination of the controls that operators have put in place and of the results obtained;</p> <p>(b) an inspection of:</p> <p>(i) equipment, means of transport, premises and other places under their control and their surroundings;</p> <p>(ii) animals and goods, including semi-finished goods, raw materials, ingredients, processing aids and other products used for the preparation and production of goods or for feeding or treating animals;</p> <p>(iii) cleaning and maintenance products and processes;</p> <p>(iv) traceability, labelling, presentation, advertising, and relevant packaging materials including materials intended to come into contact with food;</p> <p>(c) controls on the hygiene conditions in the operators' premises;</p> <p>(d) an assessment of procedures on good manufacturing practices, good hygiene practices, good farming practices, and of procedures based on the principles of hazard analysis critical control points (HACCP);</p>	<p><i>Guidance document</i></p> <p>Commission Notice 2016/C 278/01 provides that adequate infrastructure and resources must be provided to develop, organise, and execute efficient self-controls.</p> <p>3.1 Assembly of a multidisciplinary HACCP team <i>This team, which involves all parts of the food business concerned with the product, should include the whole range of specific knowledge and expertise appropriate to the product under consideration, its production (manufacture, storage, and distribution), its consumption and the associated potential hazards and should also involve as much as possible the higher management levels. The team should get the full support of the management who should consider itself owner of the HACCP plan and overall Food Safety Monitoring System.</i></p>
Number of packaging pieces per batch of production (referring to the basic packaging boxes)	Number of sampled pieces (referring to basic packing boxes)													
200 (including 200) or less	3													
201~800	4													
801~1800	5													
1801~3 200	6													
3200 or above	7													



Chinese National Standard GB/T 21270-2007 Filling of foods	EU legislation	Implementing rules and comparative evaluation
<p>7.2.4 factory inspection, in the number of sampled pieces randomly selected 3 pieces, each piece taken out of a single package of goods greater than or equal to 100g, to meet the sensory requirements of the test, net content test, health indicators test needs.</p> <p>7.2.5 Type test, in the sampling number of pieces randomly selected 3 pieces, each piece taken out of a single packaged goods greater than or equal to 300g to meet the sensory requirements of the test, net content, dry weight loss, total sugar, fat, protein and health indicators test needs.</p> <p>7.2.6 Microbiological sampling test: in accordance with the provisions of GB / T 4789.24.</p> <p>7.2.7 Physical and chemical tests: test samples mixed well and placed in wide-mouth bottles, stored in the refrigerator.</p> <p>7.2.8 Net content: test according to the method specified in JJF 1070.</p>	<p>(e) an examination of documents, traceability records and other records which may be relevant to the assessment of compliance with the rules referred to in Article 1(2), including, where appropriate, documents accompanying food, feed and any substance or material entering or leaving an establishment;</p> <p>(f) interviews with operators and with their staff; (g) the verification of measurements taken by the operator and other test results;</p> <p>(h) sampling, analysis, diagnosis, and tests;</p> <p>(i) audits of operators;</p> <p>(j) any other activity required to identify cases of non-compliance.</p>	
<p>8 Judgement rules</p> <p>8.1 Factory inspection and re-inspection</p> <p>8.1.1 The factory inspection items all conform to this standard and are judged as qualified products.</p> <p>8.1.2 If one of the indicators of total bacterial colony and coliform fails in the test results, the batch is judged to be unqualified and shall not be retested. The rest of the indicators are not qualified, can be in the same batch of products on the unqualified items for retesting, after retesting, if there is still a failure, the batch of products is judged to be unqualified.</p> <p>8.2 Type test determination and re-inspection</p> <p>8.2.1 If all the items in the type test meet the standard, the product is judged as qualified.</p> <p>8.2.2 Type test items not more than two do not meet this standard, you can double the sample retest. After retesting one does not meet this standard, the batch is judged to be unqualified. More than two or one microbiological test does not comply with this standard, the batch of products will be judged as unqualified.</p>	<p>EU Reg. 2073/2005 lays down detailed rules regarding the microbiological criteria for foodstuffs. It specifies among other things, the type of test, the analytical methods, the number of samples, the frequency of testing (in some cases) and the interpretation of the results and subsequent corrective action(s), where necessary</p>	



Chinese National Standard GB/T 21270-2007 Filling of foods	EU legislation	Implementing rules and comparative evaluation
<p>9 Labels Should comply with the provisions of GB7718.</p>	<p>Commission Regulation 1169/2011 on the provisions of food information to consumers. Regulation 1169/2011 Food Labelling</p> <p>The general principles, requirements and responsibilities governing food information and in particular food labelling were established by Regulation (EU) No. 1169/2011. This regulation provided the rules for better food labelling for products sold in the EU. It establishes what types of information are mandatory on food packaging.</p> <p>This includes:</p> <ul style="list-style-type: none"> • The name of the food. • The list of ingredients. • Any ingredients that could cause allergies or intolerances need to be separately specified. • The quantity of certain ingredients or in some cases categories of ingredients • The net amount of food contained in the package. • Relevant date markings, either best before or use by, depending on the type of product. • Should the product require special handling or storage conditions, these need to be specified. • The name and the address of the food business operator must figure on the packaging. • In some cases, the country of origin or the place of provenance should be mentioned • If a consumer runs the risk of misusing the product without instructions, clear preparation instructions must be provided. • Any product containing more than 1.2% alcohol must specify its alcoholic strength on the label. • A nutrition declaration. <p>The mandatory information needs to be presented in a language that the population of the region where the product is sold easily understands. Member States have the power to determine the exact languages to be used on products sold in said country. Moreover, this information should be in a prominent place, where it is both easily visible and clearly legible and ideally indelible. The nutrition declaration should be clear and whenever possible in a tabular form. Furthermore, the Regulation states that food labels may contain voluntary information aside from the mandatory ones listed above. However, any voluntary information provided may not mislead consumers, nor may it present an ambiguous or confusing character. Voluntary information may only be presented if the label still has space once all the mandatory information has been included.</p> <p><i>Please see below for additional information</i></p>	<p><i>Equivalent</i></p> <p><i>The Food Business Operator should ensure the final product complies with the specific labelling requirements of the standard which may be additional to those specified in EU legislation</i></p>



Chinese National Standard GB/T 21270-2007 Filling of foods	EU legislation	Implementing rules and comparative evaluation
	<p>Furthermore, the Regulation states that food labels may contain voluntary information aside from the mandatory ones listed above. However, any voluntary information provided may not mislead consumers, nor may it present an ambiguous or confusing character. Voluntary information may only be presented if the label still has space once all the mandatory information has been included.</p> <p>The Regulation further sets out rules for fair information practices in food labelling. The core idea is that consumers should have easy access to the information, which needs to be accurate, clear and easy to understand. As mentioned above regarding the voluntary information, no information provided on the packaging may mislead consumers into thinking a product has certain characteristics it does not in reality (in regards to its nature, composition, durability, origin etc..). Furthermore, food producers may not sell a product as having properties or effects it does not possess nor may they hint that a food has special characteristics that all similar foods in fact have. Images on food packaging of normally present ingredients giving the impression that the product contains these components while they have been substituted by other ingredients are also considered to be misleading for the consumer.</p>	



Chinese National Standard GB/T 21270-2007 Filling of foods	EU legislation	Implementing rules and comparative evaluation
<p>Appendix A (Informative Appendix) Classification of Food Fillings by Ingredients</p> <p>A.1 Paste</p> <p>A.1.1 Lotus seed paste Fillings made from lotus seeds as the main raw material. In addition to oil and sugar, the lotus seeds should be at least 60 % of the raw material for the filling. If the lotus seed content is 100%, it can be called pure lotus seed paste.</p> <p>A.1.2 Bean paste (sand) Fillings made from various types of beans as the main raw material.</p> <p>A.1.2.1 Fine paste (sand)</p> <p>A.1.2.1.1 Oily bean paste fillings Fillings in which oil has been added to the ingredients.</p> <p>A.1.2.1.2 Water-based bean paste fillings Fillings with no added fat in the ingredients.</p> <p>A.1.2.1.3 Dried bean paste powder Powdered fillings made by cooking, grinding, peeling, sand extraction, drying, crushing, sieving, etc.</p> <p>A.1.2.2 Paste (sand)</p> <p>A.1.2.2.1 Granulated sand fillings Fillings made by boiling in water, etc., in which particles of raw material are visible.</p> <p>A.1.2.2.2 Granulated sand fillings in sugar water Fillings containing granules of raw material mixed with sugar water, cooked in water, etc.</p> <p>A.1.3 Chestnut paste Fillings made from chestnuts, oil and sugar as the main ingredients. In addition to oil and sugar, the chestnut content of the filling should be at least 60%.</p> <p>A.1.4 Miscellaneous pastes Fillings made from other raw materials containing starch.</p> <p>A.2 Nuts Fillings made from walnuts, almonds, olives, melon seeds, sesame seeds and other nuts as the main raw material. The nut content of the filling should not be less than 20%.</p>	<p>No equivalent informative appendix exists in the EU under food hygiene regulations.</p>	<p><i>Food business operators should be aware that the nature of the food items used for filling will have consequences for the various physical and microbiological limits set in Chinese legislation.</i></p>



Chinese National Standard GB/T 21270-2007 Filling of foods	EU legislation	Implementing rules and comparative evaluation
<p>A.3 Fruits and vegetables</p> <p>A.3.1 Date paste (puree) Fillings made from dates and sugar as the main raw material.</p> <p>A.3.2 Fruits Fruits and their products as the main raw material for the processing of the filling. The amount of fruit and its products in the filling should not be less than 25%.</p> <p>A.3.3 Vegetables (fruity fillings with water) Vegetables (winter melon, carrots, etc.) and their products as the base material, with or without sugar, with or without the addition of food flavouring, colouring agents processed from the filling.</p> <p>A.4 Meat and poultry products Fillings made from meat and poultry products such as ham, barbecued pork, beef, poultry, etc., with a base of paste, nuts, etc.</p> <p>A.5 Aquatic products Fillings made from shrimps, shark's fins, abalone and other aquatic products, based on fillings such as paste and nuts.</p> <p>A.6 Others Fillings made from other raw materials.</p>	<p>No equivalent informative appendix exists in the EU under food hygiene regulations.</p>	<p><i>Food business operators should be aware that the nature of the food items used for filling will have consequences for the various physical and microbiological limits set in Chinese legislation.</i></p>



Chinese National standard GB 2760 – Food Additives

Item	Food category	Limit g/kg
Tea polyphenol (TP)	Fillings and topping syrups for bakeries (only in fillings with fat)	0.4 As catechin in fat
Capryl monoglyceride	Fillings and topping syrups for bakeries (fillings of beans only)	1.0
Indigotine, indigotine aluminum lake	Fillings and topping syrups for bakeries (fillings of crackers only)	0.1 As indigotine
Phydroxy benzoates and its salts (sodium methyl p-hydroxy benzoate, ethyl p-hydroxy benzoate, sodium ethyl p-hydroxy benzoate)	Fillings and topping syrups (only for bakeries)	0.5 As para-hydroxybenzoic acid
Neotame	Fillings and topping syrups for bakeries	0.1
Silicon dioxide	Cocoa product, including cocoa-based butters, powders, syrups, spreads and fillings, etc.	15.0
Fumaric acid	Fillings and topping syrups for	2.0
Calcium silicate	Cocoa product, including cocoa-based butters, powders, syrups, spreads and fillings, etc.	GMP
Carthamins yellow	Fillings for cereal product	0.5
Red kojic rice, monascus red	Fillings for cereal product Fillings and topping syrups for bakeries	GMP 1.0

EU Regulation EC No 1333/2008

Item	Food category (05.4)	Limit mg/kg
Tea polyphenol (TP)		Not specified in the Regulation
Capryl monoglyceride		Not specified in the Regulation
Indigotine, indigotine aluminum lake	Colours which may be used in the form of lakes	
p-hydroxy benzoate)	Decorations, coatings and fillings, except fruit-based fillings covered by category 4.2.4 only starch-based confectionery energy-reduced or with no added sugar	300
Neotame		2.0
Silicon dioxide	only foods in dried powdered form (i.e. foods dried during the production process, and mixtures thereof), excluding foods listed in table 1 of Part A of this Annex	10,000
Fumaric acid	Decorations, coatings and fillings, except fruit-based fillings covered by category 4.2.4	1000
	only fillings and toppings for fine bakery ware	2500
Calcium silicate	Dry powdered preparations of polyols	Not specified in the Regulation in this food category
Carthamins yellow		Not specified in the Regulation
Red kojic rice, monascus red		Not specified in the Regulation



Chinese National standard GB 2760 – Food Additives

Item	Food category	Limit g/kg
Beta-carotene	Fillings for cereal product Fillings and topping syrups for bakeries	GMP 1.0
Curcumin	Fillings for cereal product	GMP
Caramel colour class I – plain	Fillings and topping syrups for bakeries (fillings of flavor pie only)	GMP
Caramel colour class IV – ammonia sulphite process	Fillings for cereal product	7.5
Rose laevigata michx brown	Fillings and topping syrups for bakeries	1.0
Cocoa husk pigment	Fillings and topping syrups for bakeries	1.0
Paprika orange	Fillings and topping syrups for bakeries	1.0g/kg
Paprika red	Fillings for cereal product Fillings and topping syrups for bakeries	GMP 1.0 g/kg
Brilliant blue, brilliant blue aluminum lake	Fillings and topping syrups for bakeries (fillings of crackers only)	0.025
Maltitol and maltitol syrup	Fillings for cereal product Fillings and topping syrups for bakeries	GMP GMP
Tartrazine, tartrazine aluminum lake	Fillings and topping syrups for bakeries (fillings of flavor pie only)	0.05
	Fillings and topping syrups for bakeries (fillings of crackers only and cakes)	0.05
	Fillings and topping syrups for bakeries (pudding, pastries only)	0.3

EU Regulation EC No 1333/2008

Item	Food category (05.4)	Limit mg/kg
Beta-carotene	Beta-apo-8'-carotenal (C 30)	Not specified in the Regulation in this food category
Curcumin		Not specified in the Regulation in this food category
Caramel colour class I – plain		Not specified in the Regulation in this food category
Caramel colour class IV – ammonia sulphite process		Not specified in the Regulation in this food category
Rose laevigata michx brown		Not specified in the Regulation
Cocoa husk pigment		Not specified in the Regulation
Paprika orange		Not specified in the Regulation in this food category
Paprika red		Not specified in the Regulation in this food category
Brilliant blue, brilliant blue aluminum lake		Not specified in the Regulation in this food category
Maltitol and maltitol syrup	Only as a carrier	GMP
Tartrazine, tartrazine aluminum lake	Colours which may be used in the form of lakes	Not specified in the Regulation in this food category



Chinese National standard GB 2760 – Food Additives

Item	Food category	Limit g/kg
Sunset yellow, sunset yellow aluminum lake	Fillings and topping syrups for bakeries (fillings of crackers only)	0.1
	Fillings and topping syrups for bakeries (pudding and pastries only)	0.3
Sorbic acid	Fillings and topping syrups for bakeries (fillings for bakery wares only)	GMP
Carmoisine (azorubine)	Fillings and topping syrups for bakeries (fillings of crackers only)	0.05
Tertiary butylhydroquinone (TBHQ)	Fillings and topping syrups for bakeries	0.2
Aspartame b	Fillings and topping syrups for bakeries	1.0
Dehydroacetic acid, sodium dehydroacetate	Fillings and topping syrups for bakeries	0.5
Amaranth, amaranth aluminum lake	Fillings and topping syrups for bakeries (fillings of crackers only)	0.05 As amaranth
Ponceau 4R, ponceau 4R aluminum lake	Fillings and topping syrups for bakeries (fillings of crackers only and cakes)	0.05 As ponceau 4R
Allura red, allura aluminum lake	Fillings and topping syrups for bakeries (fillings of crackers only)	0.1 As allura red
Gardenia yellow	Fillings for cereal product and topping syrups for bakeries	1.5
		1.0
Gardenia blue	Fillings for cereal product	0.5
Gromwell red	Fillings and topping syrups for bakeries	1.0
Lac dye red (lac red)	Fillings and topping syrups for bakeries (fillings of flavor pie only)	0.5

EU Regulation EC No 1333/2008

Item	Food category (05.4)	Limit mg/kg
Sunset yellow, sunset yellow aluminum lake	only decorations, coatings and sauces, except fillings	35
	only fillings	35
Sorbic acid	only toppings (syrups for pancakes, flavoured syrups for milkshakes and ice cream; similar products)	1000
Carmoisine (azorubine)		Not specified in the Regulation in this food category
Tertiary butylhydroquinone (TBHQ)		Not specified in the Regulation in this food category
Aspartame b	only confectionery with no added sugar	1000
Dehydroacetic acid, sodium dehydroacetate		Not specified in the Regulation
Amaranth, amaranth aluminum lake		Not specified in the Regulation in this food category
Ponceau 4R, ponceau 4R aluminum lake	only fillings	55
Allura red, allura aluminum lake		Not specified in the Regulation in this food category
Gardenia yellow		Not specified in the Regulation
Gardenia blue		Not specified in the Regulation
Gromwell red		Not specified in the Regulation
Lac dye red (lac red)		Not specified in the Regulation



2.3 Chinese Food Safety Standard GB/T 30885-2014 plant protein beverage-soymilk and soymilk beverage

Chinese National Standard GB/T 30885-2014 Plant protein beverage—Soy milk and soy milk beverage	EU legislation	Implementing rules and comparative evaluation
<p>1 Scope</p> <p>This standard specifies the terms and definitions, product classification, technical requirements, test methods, inspection rules and labelling, packaging, transport and storage of soya milk and soya milk beverages.</p> <p>This standard applies to pre-packaged liquid beverages made from soy as the main raw material and processed.</p>	<p>No commodity specific hygiene legislation in the EU.</p>	<p><i>There is no product specific hygiene legislation in the EU for soya milk.</i></p> <p><i>However, general hygiene rules would apply as outlined in Reg. 178/2002 and Reg. 852/2004.</i></p> <p><i>In addition, community legislation on contaminants, pesticides, labelling and GMO would apply.</i></p>
<p>3 Terminology and definitions</p> <p>The following terms and definitions apply to this document.</p> <p>3.1 Soya milk (soy milk)</p> <p>3.1.1 Raw soy milk (soy milk)</p> <p>A product made from soybeans as the main raw material and processed without the addition of food excipients and food additives, which may also be referred to as soy milk.</p> <p>3.1.2 Soya milk in thick syrup (soy milk)</p> <p>A product made from soybeans as the main raw material, without the addition of food excipients and food additives, and processed with a high solids content of soybeans, which may also be referred to as thick soymilk.</p> <p>3.1.3 Prepared soy milk (soy milk)</p> <p>Products made from soybeans as the main raw material, to which nutritional fortificants, food additives and other food supplements may be added and processed.</p> <p>3.1.4 Fermented raw soy milk (soy milk)</p> <p>A product made from soybeans as the main raw material, to which table sugar may be added, without the addition of other food excipients and food additives, by fermentation, which may also be called sour soy milk or sour soy milk.</p>	<p>There are no specific definitions in EU hygiene legislation that covers/addresses soya milk, raw soya milk or soya milk in thick syrup etc.,</p> <p>The definitions provided are self-explanatory.</p> <p>In the EU there is a clear, legally binding definition for milk in the Common Organisation of Markets Regulation (EU) No 1308/20131 .</p> <p>The same Regulation reserves names such as milk, whey, cheese, yoghurt, butter and cream etc. exclusively for milk products.</p> <p>The judgement of the European Court of Justice ruling in June 2017 confirmed that the EU law protects the unique dairy terms against misuse by the plant- based products. The Court ruled that purely plant-based products cannot be marketed with designations such as ‘milk’, ‘cream’, ‘butter’, ‘cheese’ or ‘yoghurt’, which are reserved by EU law for animal products.</p>	<p><i>Milk and soy drinks are two different products, of different origins, ingredient compositions and nutritional value.</i></p> <p><i>Milk is a naturally white liquid produced by the mammary glands of mammals. It is therefore always a product of animal origin. Milk is naturally rich in macronutrients such as high-quality protein and micro-nutrients such as vitamins B2 and B12 and minerals, including calcium, phosphorus and iodine⁵ . Most of the vitamins and minerals naturally present in milk are artificially added to soy beverages to improve their nutritional composition (fortification).</i></p> <p><i>Soy drinks are produced in a process of first soaking soy beans and then grinding them with water. The fluid which results after straining is a basic soy drink. In order to reduce or eliminate a beany taste many soy drinks contain added sugar for sweet taste as well as flavours (such as cocoa, vanilla, etc.). Depending on the product some specific additives are also added, e.g. such as thickening agents (e.g. carrageenan) to improve the mouthfeel. Soy beans are also the basis material for other soy products often marketed as alternatives for dairy products such as yoghurt or</i></p>



Chinese National Standard GB/T 30885-2014 Plant protein beverage—Soy milk and soy milk beverage	EU legislation	Implementing rules and comparative evaluation
<p>3.1.5 Fermented Modified Soy Milk (Soy Milk) A product made from soybeans as the main raw material, to which nutritional fortification, food additives and other food supplements may be added, and fermented, which may also be called modulated sour milk or modulated sour milk.</p> <p>3.2 Soya milk (soy milk) beverages 3.2.1 Modified soya milk (soya milk) beverages Products made from soybeans, soy flour and soy protein as the main raw materials, to which nutritional fortification, food additives and other food supplements may be added, and which are processed with a low content of soy solids.</p> <p>3.2.2 Fermented soy milk (soy milk) beverages Soybean, soybean flour, soy protein as the main raw material, can add sugar, nutritional fortification, food additives, other food additives, made by fermentation, soybean solids content of the lower products.</p>	<p>This is also the case if those designations are accompanied by clarifying or descriptive terms indicating the plant origin of the product concerned.</p> <p>While the ECJ has made this ruling it appears the legislation to enforce this requirement has not yet been enacted.</p> <p>Commission will be aware of this situation and will have a more up-to-date perspective.</p>	<p><i>cream. In this case they also need specific additives in order to resemble a smell and taste of a yoghurt or cream</i></p>
<p>4 Product classification 4.1 Soya milk and soya milk beverages are classified according to product characteristics. 4.1.1 Soya milk products are classified according to the process into plain soya milk, thick soya milk, fermented soya milk and fermented soya milk; where fermented soya milk is further classified according to its characteristics into fermented plain soya milk and fermented modulated soya milk. 4.1.2 Soya milk beverage products are classified according to the process into modulated soya milk beverage and fermented soya milk beverage. 4.1.3 Fermented products are classified into sterilised (non-live) and unsterilised (live) according to whether they have been sterilised or not.</p>	<p>Classifications of a similar nature may be used by the industry in the EU albeit these classifications are purely of a commercial nature and are not mandated as outlined in GB/T 30885-2014.</p> <p>However, placing on the market of such products can only take place when the products comply with EU horizontal legislation on labelling, contaminants, residues etc.</p>	<p><i>Food business operators would need to be cognisant of the various classifications used and ensure this classification is clearly visible on product labels.</i></p>



Chinese National Standard GB/T 30885-2014 Plant protein beverage—Soy milk and soy milk beverage	EU legislation	Implementing rules and comparative evaluation
<p>5 Technical requirements</p> <p>5.1 Raw material requirements</p> <p>5.1.1 Soya beans should comply with the relevant provisions of GB1352.</p> <p>5.1.2 Soybean flour, soy protein and other food ingredients should comply with the corresponding national standards and/or relevant regulations.</p> <p>5.1.3 Fermentation strains should use <i>Lactobacillus bulgaricus</i> (<i>Lactobacillus deuterium Bulgaricum</i> subspecies), <i>Streptococcus thermophilus</i> or other strains.</p> <p>Note: Other strains are those approved by the health administrative department of the State Council.</p>	<p>In the absence on GB 1352 it is difficult to ascertain the requirements which must be satisfied by the raw materials used in the manufacture of the products in the scope of the standard.</p> <p>It is possible that good farming and manufacturing practices in the EU would satisfy these requirements.</p>	<p><i>FBOs should be aware the Chinese standard mandates that specific strains of bacteria must be used in the fermentation process.</i></p> <p><i>It should be noted that any strain used outside of those mentioned must be approved by the Chinese health administrative department.</i></p>



Chinese National Standard GB/T 30885-2014 Plant protein beverage—Soy milk and soy milk beverage	EU legislation	Implementing rules and comparative evaluation												
<p>5.2 Sensory requirements</p> <p>The sensory requirements shall be in accordance with the provisions of Table 1.</p> <p>Table 1 Sensory requirements</p> <table border="1" data-bbox="125 499 1050 1061"> <thead> <tr> <th data-bbox="125 499 315 595">Item</th> <th colspan="2" data-bbox="315 499 1050 531">Requirement</th> </tr> </thead> <tbody> <tr> <td data-bbox="125 595 315 659">Colour</td> <td colspan="2" data-bbox="315 531 1050 659">Milky white, slightly yellow, or with a colour consistent with the raw material or added ingredients</td> </tr> <tr> <td data-bbox="125 659 315 754">Taste and odour</td> <td colspan="2" data-bbox="315 659 1050 754">Taste and odour of soya milk or fermented soya milk, or with a taste and odour consistent with the added ingredients; no off-flavours</td> </tr> <tr> <td data-bbox="125 754 315 1061">Tissue condition</td> <td data-bbox="315 754 728 1061">Tissue is homogeneous and free of clots, with a small amount of protein precipitation and fat uplift allowed, and no foreign impurities visible to normal vision</td> <td data-bbox="728 754 1050 1061">Fermented soy milk Fine, homogeneous tissue, with a small amount of supernatant precipitation allowed; or a tissue state characteristic of the added component, without foreign impurities visible to normal vision</td> </tr> </tbody> </table>	Item	Requirement		Colour	Milky white, slightly yellow, or with a colour consistent with the raw material or added ingredients		Taste and odour	Taste and odour of soya milk or fermented soya milk, or with a taste and odour consistent with the added ingredients; no off-flavours		Tissue condition	Tissue is homogeneous and free of clots, with a small amount of protein precipitation and fat uplift allowed, and no foreign impurities visible to normal vision	Fermented soy milk Fine, homogeneous tissue, with a small amount of supernatant precipitation allowed; or a tissue state characteristic of the added component, without foreign impurities visible to normal vision	<p>There are no sensory requirements mandated in EU food hygiene legislation for the products mentioned in the scope of the standard.</p> <p>However, there is a general principle, whereby;</p> <p>Odour, Colour and Taste must be “Acceptable to consumers and no abnormal change”</p> <p>The sensory parameters are dealt with in the context of HACCP and Good Manufacturing Practices under EU rules.</p>	<p><i>With the application of GMP and HACCP procedures in EU production it is envisaged that the end product would be equivalent in terms of sensory parameters.</i></p>
Item	Requirement													
Colour	Milky white, slightly yellow, or with a colour consistent with the raw material or added ingredients													
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Chinese National Standard GB/T 30885-2014 Plant protein beverage—Soy milk and soy milk beverage	EU legislation	Implementing rules and comparative evaluation																																									
<p>5.3 Physical and chemical requirements The physical and chemical requirements shall be in accordance with Table 2.</p> <p>Table 2 Physical and chemical requirements</p> <table border="1" data-bbox="125 403 1144 810"> <thead> <tr> <th rowspan="3">Item</th> <th colspan="4">Indicator Standard</th> </tr> <tr> <th colspan="2">Soya milk</th> <th colspan="2">Soy milk drinks</th> </tr> <tr> <th>Thickened soy milk</th> <th>Raw soy milk, prepared soy milk, fermented soy milk</th> <th>Prepared Soy Milk Drinks</th> <th>Fermented soy milk beverage</th> </tr> </thead> <tbody> <tr> <td>Total solids/(g/100mL) ≥</td> <td>8.0</td> <td>4.0</td> <td colspan="2">2.0</td> </tr> <tr> <td>Protein/(g/100g) ≥</td> <td>3.2</td> <td>2.0</td> <td colspan="2">1.0</td> </tr> <tr> <td>Fat/(g/100g) ≥</td> <td>1.6</td> <td>0.8</td> <td colspan="2">0.4</td> </tr> <tr> <td>Urease activity</td> <td colspan="4">Negative</td> </tr> </tbody> </table>	Item	Indicator Standard				Soya milk		Soy milk drinks		Thickened soy milk	Raw soy milk, prepared soy milk, fermented soy milk	Prepared Soy Milk Drinks	Fermented soy milk beverage	Total solids/(g/100mL) ≥	8.0	4.0	2.0		Protein/(g/100g) ≥	3.2	2.0	1.0		Fat/(g/100g) ≥	1.6	0.8	0.4		Urease activity	Negative				<p>There are no mandated physical and chemical requirements in EU hygiene legislation for the products covered in the scope of this standard. However, EU Regulation 1169/2011 requires fat and protein content to be declared.</p> <table border="1" data-bbox="1229 491 1709 651"> <thead> <tr> <th>Item</th> <th>Indicator Standard</th> </tr> </thead> <tbody> <tr> <td>Total solids %</td> <td>11.92 ± 0.07</td> </tr> <tr> <td>Protein/(g/100g)</td> <td>3.29 ± 0.06</td> </tr> <tr> <td>Fat 5</td> <td>0.66 ± 0.01</td> </tr> </tbody> </table> <p>Inserted under is the proximate composition analysis of soymilk noted in tables published in Research Gate.</p> <p>The composition of soya-based products in the EU is governed by commercial drivers and will vary from product to product.</p>	Item	Indicator Standard	Total solids %	11.92 ± 0.07	Protein/(g/100g)	3.29 ± 0.06	Fat 5	0.66 ± 0.01	<p><i>The Food Business Operator should ensure the final product complies with the physical and chemical requirements of the standard. From an examination of compositional data available in scientific literature the value specified in the standard should be attainable.</i></p>
Item		Indicator Standard																																									
		Soya milk		Soy milk drinks																																							
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<p>5.4 Requirements for lactic acid bacteria viable count The live count of lactic acid bacteria for the unpasteurised (live) type shall comply with the provisions of Table 3.</p> <p>Table 3 Lactic acid bacteria viable count requirements</p> <table border="1" data-bbox="125 1099 705 1321"> <thead> <tr> <th>Test period</th> <th>Indicator</th> </tr> </thead> <tbody> <tr> <td>Factory period</td> <td>≥1x10⁶ CFU/mL</td> </tr> <tr> <td>Sales period</td> <td>In accordance with the number of live lactic acid bacteria indicated on the product label</td> </tr> </tbody> </table>	Test period	Indicator	Factory period	≥1x10 ⁶ CFU/mL	Sales period	In accordance with the number of live lactic acid bacteria indicated on the product label	<p>Again there are no mandated lactic acid bacteria viable count numbers in EU hygiene legislation for the products covered in the scope of this standard.</p> <p>Commercial drivers will dictate the type and quantity of cultures used in the production process.</p>	<p><i>The Food Business Operator should ensure the final product complies with the live counts specified in the standard.</i></p>																																			
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Chinese National Standard GB/T 30885-2014 Plant protein beverage—Soy milk and soy milk beverage	EU legislation	Implementing rules and comparative evaluation
<p>5.5 Food safety requirements</p> <p>It shall comply with the provisions of the corresponding national food safety standards.</p>	<p>There is no product specific hygiene legislation in the EU for products covered by the scope of this standard.</p> <p>However, general hygiene rules would apply as outlined in Reg.178/2002 and Reg. 852/2004. In addition, community legislation on contaminants, pesticides, labelling and GMO would apply.</p>	<p><i>There is no product specific hygiene legislation in the EU for products covered by the scope of this standard.</i></p> <p><i>However, general hygiene rules would apply as outlined in Reg.178/2002 and Reg. 852/2004.</i></p> <p><i>In addition, community legislation on contaminants, pesticides, labelling and GMO would apply.</i></p>
<p>6 Test methods</p> <p>6.1 Sensory examination</p> <p>Take approximately 50 mL of the sample to be tested in a colourless and transparent container, place it in a bright place, observe its tissue state and colour in the light, and smell and taste it at room temperature.</p> <p>6.2 Total solids</p> <p>6.2.1 Apparatus and materials</p> <p>6.2.1.1 Constant temperature oven: temperature control accuracy of 1/8 to 2°C.</p> <p>6.2.1.2 Desiccator: containing desiccant.</p> <p>6.2.1.3 Analytical balance: 0.0001g sensitivity.</p> <p>6.2.1.4 Flat weighing dish: 70mmx35mm or 60mmx30mm.</p> <p>6.2.1.5 Sea sand.</p> <p>6.2.1.6 Constant temperature water bath.</p> <p>6.2.2 Analytical procedures</p> <p>6.2.2.1 Preparation of the sample</p> <p>Shake the sample in the packing container, pour into a beaker and stir well.</p> <p>6.2.2.2 Absorb 10.00 mL of the sample (6.2.2.1) into a constant weight weighing dish containing an appropriate amount of sea sand, evaporate to dryness on a water bath, remove the weighing dish, wipe off any adhering water, place in a constant temperature drying oven and bake at 100°C to 105°C for 1 h. Remove and cool in a desiccator for 30 min before weighing. Then, bake again in a constant temperature drying oven for 1h until constant weight.</p>	<p>Art 43 of Chapter IV of Regulation (EU) 2017/625 would apply as it lays down rules on methods used for sampling, analyses, tests and diagnoses.</p>	<p><i>Equivalence between the Chinese laboratory methods and ISO standards should be clarified in advance of any trade. Should equivalence be determined then note should be taken of any differences in the limits for the various contaminants and microbiological indicators mentioned in the standard.</i></p> <p>Art. 34 Chapter IV of Regulation (EU) 2017/625 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules (consolidated version 28.10.2021) lays down rules on methods used for sampling, analyses, tests and diagnoses. In addition, Annex III of this regulation details the characteristics of methods of analysis</p>



Chinese National Standard GB/T 30885-2014 Plant protein beverage—Soy milk and soy milk beverage	EU legislation	Implementing rules and comparative evaluation
<p>6.2.3 Calculation of results</p> <p>The total solids content in the specimen is calculated according to equation (1).</p> $X = \frac{m_2 - m_1}{10} \times 100 \quad \dots\dots\dots (1)$ <p>where: X - content of total solids in the specimen in grams per hundred millilitres (g/100mL) m₂ - the mass of the dried specimen plus sea sand and weighing dish in grams (g) m₁ - mass of sea sand and weighing dish in grams (g) 10 - volume of the sample drawn up in millilitres (mL). The results obtained are expressed to one decimal place.</p>		

Chinese National Standard GB/T 30885-2014 Plant protein beverage—Soy milk and soy milk beverage	EU legislation	Implementing rules and comparative evaluation
<p>6.2.4 Permissible differences The absolute difference between the results of two independent determinations obtained under reproducible conditions should not exceed 5% of the arithmetic mean.</p> <p>6.3 Protein Determined by the method specified in GB5009.5, with a conversion factor of 6.25 for protein.</p> <p>6.4 Fat Determination according to the method specified in GB 5413.3.</p> <p>6.5 Urease activity Determined by the method specified in Appendix A.</p> <p>6.6 Lactic acid bacteria live count Determined according to the method specified in GB 4789.35.</p> <p>6.7 Total number of bacteria and coliforms Determined in accordance with the methods specified in GB 4789.2 and GB 4789.3.</p>	<p>EU Regulation 1169/2011 on the provision of information to consumers lays down rules for the declaration of protein and fat thus requiring these nutrients to be quantified.</p> <p>ISO standardised methods for fat and protein. No specific regulation on urease activity. No specific regulation on lactic acid bacteria</p> <p>Commission Regulation (EC) No 2073/2005 of 15 November 2005 on microbiological criteria for foodstuffs (2) lays down microbiological criteria for certain micro-organisms and the implementing rules to be complied with by food business operators when implementing the general and specific hygiene measures referred to in Article 4 of Regulation (EC) No 852/2004.</p>	<p><i>The food business operator should ensure the tests used for the quantification of items in 6.2.4. are equivalent to the methods specified in the standard.</i> <i>It is suggested that the relevant ISO methods would fulfil this requirement.</i></p>



Chinese National Standard GB/T 30885-2014 Plant protein beverage—Soy milk and soy milk beverage	EU legislation	Implementing rules and comparative evaluation
<p>7 Inspection rules</p> <p>7.1 Group batch The quality management department of the manufacturer determines the batch of the product in accordance with its corresponding rules.</p> <p>7.2 Factory inspection</p> <p>7.2.1 Before leaving the factory, the product shall be inspected by the inspection department of the enterprise according to this standard and shall only leave the factory if it meets the standard requirements.</p> <p>7.2.2 Factory inspection items include: organoleptic requirements, protein, urease activity, total bacterial count and coliform.</p> <p>Unpasteurised (live) products The product should also be tested for the number of viable lactic acid bacteria.</p> <p>Note: For products that are quality managed in accordance with commercial aseptic requirements, factory testing for coliform and coliform is optional.</p> <p>7.3 Type testing</p> <p>7.3.1 Type test items include: all items specified in 5.2 to 5.5 of this standard.</p> <p>7.3.2 Under normal circumstances, the product needs to be type tested once a year. One of the following circumstances shall occur, the type test.</p> <ul style="list-style-type: none"> - Raw materials, process when a major change occurs - When production is resumed after the suspension of production - Ex-factory test results and the usual records have a large difference. 	<p>Regulation (EC) No 852/2004, Article 5 (f) establishing procedures, which shall be carried out regularly, to verify that the measures outlined in subparagraphs (a) to (e) are working effectively;</p> <p>The verification of effective self-controls is a key objective of official controls in food establishments:</p> <p>Regulation (EU) 2017/625, Article 14 Official control methods and techniques shall include the following as appropriate:</p> <p>(a) an examination of the controls that operators have put in place and of the results obtained;</p> <p>(b) an inspection of:</p> <p>(i) equipment, means of transport, premises and other places under their control and their surroundings;</p> <p>(ii) animals and goods, including semi-finished goods, raw materials, ingredients, processing aids and other products used for the preparation and production of goods or for feeding or treating animals;</p> <p>(iii) cleaning and maintenance products and processes;</p> <p>(iv) traceability, labelling, presentation, advertising, and relevant packaging materials including materials intended to come into contact with food;</p> <p>(c) controls on the hygiene conditions in the operators' premises;</p> <p>(d) an assessment of procedures on good manufacturing practices, good hygiene practices, good farming practices, and of procedures based on the principles of hazard analysis critical control points (HACCP);</p> <p>(e) an examination of documents, traceability records and other records which may be relevant to the assessment of compliance with the rules referred to in Article 1(2), including, where appropriate, documents accompanying food, feed and any substance or material entering or leaving an establishment;</p>	<p>Guidance document Commission Notice 2016/C 278/01 provides that <i>adequate infrastructure and resources must be provided to develop, organise, and execute efficient self-controls.</i></p> <p>3.1 <i>Assembly of a multidisciplinary HACCP team This team, which involves all parts of the food business concerned with the product, should include the whole range of specific knowledge and expertise appropriate to the product under consideration, its production (manufacture, storage, and distribution), its consumption and the associated potential hazards and should also involve as much as possible the higher management levels. The team should get the full support of the management who should consider itself owner of the HACCP plan and overall Food Safety Monitoring System.</i></p>



Chinese National Standard GB/T 30885-2014 Plant protein beverage—Soy milk and soy milk beverage	EU legislation	Implementing rules and comparative evaluation
<p>7.4 Judgement rules</p> <p>7.4.1 When the test results are all qualified, the whole batch of products is judged to be qualified. If three or more of the test results (including three) do not meet this standard, the whole batch of products shall be judged as unqualified.</p> <p>7.4.2 If not more than two (including two) of the test results do not conform to this standard, the sampling may be doubled in the same batch of products for retesting, and the retesting results shall prevail. If one of the retest results still does not conform to this standard, the whole batch of products shall be judged as unqualified.</p>	<p>(f) interviews with operators and with their staff; (g) the verification of measurements taken by the operator and other test results;</p> <p>(h) sampling, analysis, diagnosis, and tests;</p> <p>(i) audits of operators;</p> <p>(j) any other activity required to identify cases of non-compliance.</p>	
<p>8 Marking, packaging, transport and storage</p> <p>8.1 Marking</p> <p>8.1.1 The labelling of prepackaged products shall comply with GB7718 and relevant regulations, in addition to the following requirements.</p> <ul style="list-style-type: none"> - Labelling the type of product, which may be labelled as "Soy Milk Beverage" for soy milk drinks - The protein content of the product should be indicated. - Fermented products shall be labelled as sterilised (non-bacterial) and unsterilised (bacterial). - Unpasteurised (live) products should be labelled with the number of live lactic acid bacteria and the storage temperature of the product should also be indicated. 	<p>The EU Food Information to Consumers Regulation No 1169/2011 (FIC) covers the general food labelling and nutrition information requirements for pre-packed foods. General food labelling includes areas such as the name of the food, ingredients lists and allergen information.</p> <p>Annex VI Part A point 1</p> <p>The name of the food shall include or be accompanied by particulars as to the physical condition of the food or the specific treatment which it has undergone (for example, powdered, refrozen, freeze-dried, quick-frozen, concentrated, smoked) in all cases where omission of such information could mislead the purchaser.</p>	<p><i>The Food Business Operator should ensure the final product complies with the specific labelling requirements of the standard which may be additional to those specified in EU legislation</i></p> <p><i>e.g. labelling</i></p> <ul style="list-style-type: none"> • <i>the type of product</i> • <i>the protein content of the product</i> • <i>Fermented products shall be labelled as sterilised (non-bacterial) and unsterilised (bacterial).</i> • <i>Unpasteurised (live) products should be labelled with the number of live lactic acid bacteria and the storage temperature of the product should also be indicated.</i>



Chinese National Standard GB/T 30885-2014 Plant protein beverage—Soy milk and soy milk beverage	EU legislation	Implementing rules and comparative evaluation
<p>8.2 Packaging</p> <p>Packaging materials and containers shall comply with the provisions of the relevant national food safety standards.</p>	<p>Regulation (EC) No 852/2004, Annex II, Chapter X,</p> <ol style="list-style-type: none"> 1. Material used for wrapping and packaging are not to be a source of contamination. 2. Wrapping materials are to be stored in such a manner that they are not exposed to a risk of contamination. 3. Wrapping and packaging operations are to be carried out so as to avoid contamination of the products. <p>Regulation (EC) No 852/2004, Annex II, Chapter IX</p> <ol style="list-style-type: none"> 2. Raw materials and all ingredients stored in a food business are to be kept in appropriate conditions designed to prevent harmful deterioration and protect them from contamination. 3. At all stages of production, processing and distribution, food is to be protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state. 4. Adequate procedures are to be in place to control pests. Adequate procedures are also to be in place to prevent domestic animals from having access to places where food is prepared, handled, or stored (or, where the competent authority so permits in special cases, to prevent such access from resulting in contamination). 	<p><i>Equivalence</i></p>



Chinese National Standard GB/T 30885-2014 Plant protein beverage—Soy milk and soy milk beverage	EU legislation	Implementing rules and comparative evaluation
<p>8.3 Transport and storage</p> <p>The product should be stored in a clean, light-proof, dry, ventilated, insect-free and rodent-free warehouse; it should not be mixed with toxic, harmful, odorous, volatile or corrosive substances for transport or storage; unpasteurised (live) products that require refrigeration should be transported and stored at 0°C to 10°C.</p>	<p>Regulation (EC) No 852/2004, Annex II, Chapter IX,</p> <p>2. Raw materials and all ingredients stored in a food business are to be kept in appropriate conditions designed to prevent harmful deterioration and protect them from contamination.</p> <p>3. At all stages of production, processing and distribution, food is to be protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state.</p> <p>Regulation (EC) No 852/2004, Annex II, Chapter IV</p> <p>1. Conveyances and/or containers used for transporting foodstuffs are to be kept clean and maintained in good repair and condition to protect foodstuffs from contamination and are, where necessary, to be designed and constructed to permit adequate cleaning and/or disinfection.</p> <p>2. Receptacles in vehicles and/or containers are not to be used for transporting anything other than foodstuffs where this may result in contamination.</p> <p>3. Where conveyances and/or containers are used for transporting anything in addition to foodstuffs or for transporting different foodstuffs at the same time, there is, where necessary, to be effective separation of products.</p>	<p><i>There is broad equivalence in storage and transport requirements in both legislations.</i></p>



2.4 Chinese Food Safety Standard GB/T 30885-2014 plant protein beverage-soymilk and soymilk beverage

Chinese National Standard GB/T 18738-2006 Instant soy milk powder and soy milk with dairy product powder	EU legislation	Implementing rules and comparative evaluation
<p>Scope This standard specifies the terms and definitions, product classification, requirements, test methods, inspection rules, labelling, packaging, transport and storage requirements for instant soya flour and soya milk powder. This standard applies to powdered or particulate food products made from soybeans as the main raw material by grinding, heating and enzyme inactivation and spray drying.</p>	<p>No commodity specific hygiene legislation in the EU.</p>	<p><i>There is no product specific hygiene legislation in the EU for soya milk powder and soya milk powder with dairy product powder. See note over. However, general hygiene rules would apply as outlined in Reg. 178/2002 and Reg. 852/2004. In addition, community legislation on contaminants, pesticides, labelling and GMO would apply.</i></p>
<p>3 Terminology and definitions The following terms and definitions apply to this standard.</p> <p>3.1 instant soymilk powder Powder or granular foodstuff made from soybean as the main raw material by grinding, heating, enzyme inactivation, concentration and spray drying.</p> <p>3.2 soymilk powder with dairy product powder Powdered or micronized foodstuffs made from soybean and dairy products by grinding, heating and enzyme inactivation, concentration and spray drying.</p>	<p>There are no equivalent definitions in EU food hygiene legislation. Regarding the reference to dairy products over Milk and milk products must have been produced in accordance with the conditions laid down in: Regulation (EC) No 178/2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety. Regulation (EC) No 852/2004 on the hygiene of foodstuffs Regulation (EC) No 853/2004 laying down specific rules for food of animal origin.</p>	



Chinese National Standard GB/T 18738-2006 Instant soy milk powder and soy milk with dairy product powder	EU legislation	Implementing rules and comparative evaluation
<p>4 Product classification</p> <p>4.1 The products are classified into two categories according to the process.</p> <p>4.1.1 Category I: products made from soya beans by grinding, de-slugging, adding or not adding sugar, adding or not adding fresh milk (or milk powder) and other auxiliaries, heating to inactivate enzymes, concentrating and spray drying.</p> <p>4.1.2 Type II: products made from soybeans by milling, with or without the addition of sugar, with or without the addition of fresh milk (or milk powder) and other excipients, heating to inactivate enzymes and spray drying.</p> <p>4.2 Category I and II products are divided into five types according to the added excipients and physicochemical indicators.</p> <p>The five types include: normal, high protein, low sugar, low sugar high protein and other.</p>	<p>There are no similar classifications mandated in EU hygiene rules.</p> <p>However, the classification may be used in the industry purely on a commercial basis.</p>	<p><i>The Food business operator in the EU should be aware of the classifications used in the standard and should comply with any labelling requirements necessitated by such classifications.</i></p>
<p>5 Requirements</p> <p>5.1 Raw material requirements</p> <p>5.1.1 Soya beans should comply with the provisions of GB/T 8612.</p> <p>5.1.2 White sugar should comply with the provisions of GB317.</p> <p>5.1.3 Other auxiliary materials should comply with the provisions of the corresponding product standards.</p>	<p>Regulation 852/2004 (consolidated)</p> <p>Council Directive 2001/111/EC relating to certain sugars intended for human consumption.</p> <p>Regulation 852/2004 (consolidated)</p>	



Chinese National Standard GB/T 18738-2006 Instant soy milk powder and soy milk with dairy product powder	EU legislation	Implementing rules and comparative evaluation												
<p>5.2 Sensory requirements The sensory requirements of each item are shown in Table 1.</p> <p>Table 1</p> <table border="1" data-bbox="125 379 943 831"> <thead> <tr> <th>Item</th> <th>Requirement</th> </tr> </thead> <tbody> <tr> <td>Colour</td> <td>Light yellow or milky white, other types of product should conform to the colour of the product after the addition of auxiliaries.</td> </tr> <tr> <td>Appearance</td> <td>Powdered or granulated, no lumps.</td> </tr> <tr> <td>Odour and taste</td> <td>The product should have the characteristic flavour of soybeans and the flavour of the variety, with a pure taste and no off-flavour.</td> </tr> <tr> <td>Mixing properties</td> <td>Wetting and sinking quickly, easy to dissolve after blending, a very small amount of lumps allowed.</td> </tr> <tr> <td>Miscellaneous Quality</td> <td>No foreign impurities visible to the normal eye.</td> </tr> </tbody> </table>	Item	Requirement	Colour	Light yellow or milky white, other types of product should conform to the colour of the product after the addition of auxiliaries.	Appearance	Powdered or granulated, no lumps.	Odour and taste	The product should have the characteristic flavour of soybeans and the flavour of the variety, with a pure taste and no off-flavour.	Mixing properties	Wetting and sinking quickly, easy to dissolve after blending, a very small amount of lumps allowed.	Miscellaneous Quality	No foreign impurities visible to the normal eye.	<p>There are no sensory requirements mandated in EU food hygiene legislation for the products mentioned in the scope of the standard.</p> <p>However, there is a general principle, whereby; Odour, Colour and Taste must be “Acceptable to consumers and no abnormal change”</p> <p>The sensory parameters are dealt with in the context of HACCP and Good Manufacturing Practices under EU rules</p>	<p><i>With the application of GMP and HACCP procedures in EU production it is envisaged that the end product would be equivalent in terms of sensory parameters.</i></p>
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Chinese National Standard GB/T 18738-2006 Instant soy milk powder and soy milk with dairy product powder	EU legislation	Implementing rules and comparative evaluation
<p>5.3 Net content deviation requirements Shall comply with the provisions of the "Supervision and Administration of Quantitative Packaging Commodity Measurement</p> <p>Part 1/2</p>	<p>COUNCIL DIRECTIVE 76/211 of 20 January 1976 which was last amended in 2019 (2019/1243) on the approximation of the laws of the Member States relating to the making-up by weight or by volume of certain prepackaged products.</p> <p>This Directive relates to prepackages containing products intended for sale in constant unit nominal quantities which are:</p> <ul style="list-style-type: none"> - equal to values predetermined by the packer, - expressed in units of weight or volume, - not less than 5 g or 5 ml and not more than 10 kg or 10 l. <p>Prepackages covered by this Directive shall be made up in such a way that the completed packages satisfy the following requirements:</p> <ul style="list-style-type: none"> - the actual contents shall not be less, on average, than the nominal quantity; - the proportion of prepackages having a negative error greater than the tolerable negative error laid down in 2.4 shall be sufficiently small for batches of prepackages to satisfy the requirements of the tests specified in Annex II; - 1no prepackage having a negative error greater than twice the tolerable negative error given in the table in 2.4 may bear the EEC sign provided for in 3.3. <p>The tolerable negative error in the contents of a prepackage is fixed in accordance with the first table below while the non-destructive testing shall be carried out in accordance with a double sampling plan as shown in the second table below:</p>	<p><i>The rules specified in the EU legislation are broadly equivalent to those required of the standard.</i></p>



Chinese National Standard GB/T 18738-2006 Instant soy milk powder and soy milk with dairy product powder	EU legislation	Implementing rules and comparative evaluation																																																																						
<p>5.3 Net content deviation requirements Shall comply with the provisions of the "Supervision and Administration of Quantitative Packaging Commodity Measurement</p> <p>Part 1/2</p>	<p><i>Continuation from above</i></p> <table border="1" data-bbox="734 347 1677 651"> <thead> <tr> <th rowspan="2">Nominal quantity Qn in grams or millilitres</th> <th colspan="2">Tolerable negative error</th> </tr> <tr> <th>as % of Qn</th> <th>g or ml</th> </tr> </thead> <tbody> <tr> <td>5 to 50</td> <td>9</td> <td>—</td> </tr> <tr> <td>from 50 to 100</td> <td>—</td> <td>4.5</td> </tr> <tr> <td>from 100 to 200</td> <td>4.5</td> <td>—</td> </tr> <tr> <td>from 200 to 300</td> <td>—</td> <td>9</td> </tr> <tr> <td>from 300 to 500</td> <td>3</td> <td>—</td> </tr> <tr> <td>from 500 to 1 000</td> <td>—</td> <td>15</td> </tr> <tr> <td>from 1 000 to 10 000</td> <td>1.5</td> <td>—</td> </tr> </tbody> </table> <p>(76/211/EEC)</p> <table border="1" data-bbox="728 730 1671 1058"> <thead> <tr> <th rowspan="2">Number in batch</th> <th colspan="3">Samples</th> <th colspan="2">Number of defective units</th> </tr> <tr> <th>Order</th> <th>Number</th> <th>Aggregate number</th> <th>Acceptance criterion</th> <th>Rejection criterion</th> </tr> </thead> <tbody> <tr> <td rowspan="2">100 to 500</td> <td>1st</td> <td>30</td> <td>30</td> <td>1</td> <td>3</td> </tr> <tr> <td>2nd</td> <td>30</td> <td>60</td> <td>4</td> <td>5</td> </tr> <tr> <td rowspan="2">501 to 3 200</td> <td>1st</td> <td>50</td> <td>50</td> <td>2</td> <td>5</td> </tr> <tr> <td>2nd</td> <td>50</td> <td>100</td> <td>6</td> <td>7</td> </tr> <tr> <td rowspan="2">3 201 and over</td> <td>1st</td> <td>80</td> <td>80</td> <td>3</td> <td>7</td> </tr> <tr> <td>2nd</td> <td>80</td> <td>160</td> <td>8</td> <td>9</td> </tr> </tbody> </table> <p>The consolidated version of Council Directive 80/181/EEC on the approximation of the laws of the Member States relating to units of measurement and on the repeal of Directive 71/354/EEC lists and defines the legal units that must be used to express quantities in the European Union (EU). It specifies that the metric units of measurement / International System of Units (SI units)* are applicable in the EU. SI units are mandatory in the EU for economic, public-health, public-safety and administrative purposes.</p>	Nominal quantity Qn in grams or millilitres	Tolerable negative error		as % of Qn	g or ml	5 to 50	9	—	from 50 to 100	—	4.5	from 100 to 200	4.5	—	from 200 to 300	—	9	from 300 to 500	3	—	from 500 to 1 000	—	15	from 1 000 to 10 000	1.5	—	Number in batch	Samples			Number of defective units		Order	Number	Aggregate number	Acceptance criterion	Rejection criterion	100 to 500	1st	30	30	1	3	2nd	30	60	4	5	501 to 3 200	1st	50	50	2	5	2nd	50	100	6	7	3 201 and over	1st	80	80	3	7	2nd	80	160	8	9	<p><i>The rules specified in the EU legislation are broadly equivalent to those required of the standard.</i></p>
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<p>5.4 Class I physical and chemical requirements Should be consistent with the provisions of Table 2.</p> <p>Table 2</p> <table border="1" data-bbox="129 411 1055 1161"> <thead> <tr> <th rowspan="2">Item</th> <th colspan="5">I Class</th> </tr> <tr> <th>General</th> <th>High Protein</th> <th>Low Sugar</th> <th>Low Sugar High Protein</th> <th>Other types</th> </tr> </thead> <tbody> <tr> <td>Moisture/(%) ≤</td> <td>4.0</td> <td>4.0</td> <td>4.0</td> <td>5.0</td> <td>4.0</td> </tr> <tr> <td>Protein/(%) ≥</td> <td>18.0</td> <td>22.0</td> <td>18.0</td> <td>32.0</td> <td>18.0</td> </tr> <tr> <td>Fat/(%) ≥</td> <td>8.0</td> <td>6.0</td> <td>8.0</td> <td>12.0</td> <td>8.0</td> </tr> <tr> <td>Total sugar (in sucrose)/(%) ≤</td> <td>60.0</td> <td>50.0</td> <td>45.0</td> <td>20.0</td> <td>55.0</td> </tr> <tr> <td>Ash/(%) ≤</td> <td>3.0</td> <td>3.0</td> <td>5.0</td> <td>6.5</td> <td>5.0</td> </tr> <tr> <td>Solubility/(g/100g) ≥</td> <td>97.0</td> <td>92.0</td> <td>92.0</td> <td>90.0</td> <td>92.0</td> </tr> <tr> <td>Total acid (as lactic acid)/(g/kg) ≤</td> <td colspan="5">10.0</td> </tr> <tr> <td rowspan="2">Urease (Urease) activity</td> <td colspan="2">Qualitative method</td> <td colspan="3">Negative</td> </tr> <tr> <td colspan="2">Quantitative method / (mg/g) ≤</td> <td colspan="3">0.02</td> </tr> <tr> <td>Total arsenic (as As) / (mg/kg) ≤</td> <td colspan="5">0.5</td> </tr> <tr> <td>Lead (Pb)/(mg/kg) ≤</td> <td colspan="5">1.0</td> </tr> <tr> <td>Copper (Cu) / (mg/kg) ≤</td> <td>10.0</td> <td>20.0</td> <td>10.0</td> <td colspan="2"></td> </tr> </tbody> </table>	Item	I Class					General	High Protein	Low Sugar	Low Sugar High Protein	Other types	Moisture/(%) ≤	4.0	4.0	4.0	5.0	4.0	Protein/(%) ≥	18.0	22.0	18.0	32.0	18.0	Fat/(%) ≥	8.0	6.0	8.0	12.0	8.0	Total sugar (in sucrose)/(%) ≤	60.0	50.0	45.0	20.0	55.0	Ash/(%) ≤	3.0	3.0	5.0	6.5	5.0	Solubility/(g/100g) ≥	97.0	92.0	92.0	90.0	92.0	Total acid (as lactic acid)/(g/kg) ≤	10.0					Urease (Urease) activity	Qualitative method		Negative			Quantitative method / (mg/g) ≤		0.02			Total arsenic (as As) / (mg/kg) ≤	0.5					Lead (Pb)/(mg/kg) ≤	1.0					Copper (Cu) / (mg/kg) ≤	10.0	20.0	10.0			<p>EU Regulation 2023/915 There are no equivalent tables for contaminants in EU food hygiene regulations for the products in the scope of this standard with the exception of the food in the table under.</p> <p>Total sugar, ash, solubility, total lactic acid and urease activity would be governed by good manufacturing practices, industry standards and HACCP based procedures.</p> <p>EU Regulation 1169/2011 on the provision of information to consumers lays down rules for the declaration of moisture, protein and fat thus requiring these nutrients to be quantified.</p> <table border="1" data-bbox="1111 842 1753 1002"> <thead> <tr> <th>Item</th> <th>Food</th> <th>Mg/kg*</th> </tr> </thead> <tbody> <tr> <td>Lead</td> <td>Raw milk (2), heat-treated milk and milk for the manufacture of milk-based products</td> <td>0,020</td> </tr> </tbody> </table> <p>*The maximum level applies to the wet weight.</p>	Item	Food	Mg/kg*	Lead	Raw milk (2), heat-treated milk and milk for the manufacture of milk-based products	0,020	<p><i>The Food Business Operator should ensure the final product complies with the physical and chemical requirements of the standard.</i></p>
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<p>5.5 Class I physical and chemical requirements Shall conform to the provisions of Table 3.</p> <p>Table 3</p> <table border="1" data-bbox="125 408 1055 963"> <thead> <tr> <th rowspan="2">Item</th> <th colspan="3">II Class</th> </tr> <tr> <th>Regular</th> <th>Low Sugar</th> <th>Other type</th> </tr> </thead> <tbody> <tr> <td>Moisture / (%) ≤</td> <td colspan="3">4.0</td> </tr> <tr> <td>Protein / (%) ≥</td> <td colspan="3">15.0</td> </tr> <tr> <td>Fat (%) ≥</td> <td colspan="3">8.0</td> </tr> <tr> <td>Total sugar (in sucrose) / (%) ≤</td> <td>60.0</td> <td>45.0</td> <td>60.0</td> </tr> <tr> <td>Ash / (%) ≤</td> <td>5.0</td> <td>5.0</td> <td>5.0</td> </tr> <tr> <td>Solubility / (g/100g) ≥</td> <td>88.0</td> <td>85.0</td> <td>85.0</td> </tr> <tr> <td>Sedimentation index ≤</td> <td colspan="3">0.2</td> </tr> <tr> <td>Total acid (as lactic acid) / (g/kg) ≤</td> <td colspan="3">10.0</td> </tr> <tr> <td rowspan="2">Urease (Urease) activity</td> <td colspan="3">Negative</td> </tr> <tr> <td colspan="3">Quantitative method / (mg/g) ≤ 0.02</td> </tr> <tr> <td>Total arsenic (as As) / (mg/kg) ≤</td> <td colspan="3">0.5</td> </tr> <tr> <td>Lead (Pb) / (mg/kg) ≤</td> <td colspan="3">1.0</td> </tr> <tr> <td>Copper (Cu) / (mg/kg) ≤</td> <td colspan="3">10.0</td> </tr> </tbody> </table>	Item	II Class			Regular	Low Sugar	Other type	Moisture / (%) ≤	4.0			Protein / (%) ≥	15.0			Fat (%) ≥	8.0			Total sugar (in sucrose) / (%) ≤	60.0	45.0	60.0	Ash / (%) ≤	5.0	5.0	5.0	Solubility / (g/100g) ≥	88.0	85.0	85.0	Sedimentation index ≤	0.2			Total acid (as lactic acid) / (g/kg) ≤	10.0			Urease (Urease) activity	Negative			Quantitative method / (mg/g) ≤ 0.02			Total arsenic (as As) / (mg/kg) ≤	0.5			Lead (Pb) / (mg/kg) ≤	1.0			Copper (Cu) / (mg/kg) ≤	10.0			<p>EU Regulation 2023/915 There are no equivalent tables for contaminants in EU food hygiene regulations for the products in the scope of this standard with the exception of the food in the table under.</p> <p>Total sugar, ash, solubility, sedimentation index, total lactic acid and urease activity would be governed by good manufacturing practices, industry standards and HACCP based procedures.</p> <p>EU Regulation 1169/2011 on the provision of information to consumers lays down rules for the declaration of moisture, protein and fat thus requiring these nutrients to be quantified.</p> <table border="1" data-bbox="1111 842 1753 1002"> <thead> <tr> <th>Item</th> <th>Food</th> <th>Mg/kg*</th> </tr> </thead> <tbody> <tr> <td>Lead</td> <td>Raw milk (2), heat-treated milk and milk for the manufacture of milk-based products</td> <td>0,020</td> </tr> </tbody> </table>	Item	Food	Mg/kg*	Lead	Raw milk (2), heat-treated milk and milk for the manufacture of milk-based products	0,020	<p><i>The Food Business Operator should ensure the final product complies with the physical and chemical requirements of the standard.</i></p>
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Chinese National Standard GB/T 18738-2006 Instant soy milk powder and soy milk with dairy product powder	EU legislation	Implementing rules and comparative evaluation																															
<p>5.6 Microbiological requirements Shall comply with the provisions of Table 4.</p> <p>Table 4</p> <table border="1" data-bbox="125 400 848 655"> <thead> <tr> <th>Item</th> <th>Indicator Standard</th> </tr> </thead> <tbody> <tr> <td>Total number of bacterial colonies /(cfu/g) ≤</td> <td>30 000</td> </tr> <tr> <td>Coliform/(MPN/100g) ≤</td> <td>90</td> </tr> <tr> <td>Pathogenic bacteria (Salmonella, Shigella, Staphylococcus aureus)</td> <td>Not detectable</td> </tr> <tr> <td>Moulds /(cfu/g) ≤</td> <td>100</td> </tr> </tbody> </table>	Item	Indicator Standard	Total number of bacterial colonies /(cfu/g) ≤	30 000	Coliform/(MPN/100g) ≤	90	Pathogenic bacteria (Salmonella, Shigella, Staphylococcus aureus)	Not detectable	Moulds /(cfu/g) ≤	100	<p>There are no specific microbiological limits set for the products covered in the scope of this standard with the exception of “dairy product powder:</p> <p>Commission regulation (EC) 2073/2005 on microbiological criteria for foodstuffs sets limits for milk powder and whey powder</p> <table border="1" data-bbox="898 464 1733 647"> <thead> <tr> <th rowspan="2">Food Category</th> <th rowspan="2">Microorganism</th> <th colspan="2">Sampling Plan</th> <th colspan="2">Limits</th> </tr> <tr> <th>n</th> <th>c</th> <th>m</th> <th>M</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Milk powder and Whey powder*</td> <td>Entero</td> <td>5</td> <td>0</td> <td colspan="2">10cfu/g</td> </tr> <tr> <td>Coagulase – positive staph</td> <td>5</td> <td>2</td> <td>10</td> <td>100</td> </tr> </tbody> </table> <p>*The criterion does not apply to products intended for further processing in the food industry.</p> <p>Compliance with microbiological criteria' means obtaining satisfactory or acceptable results set in the regulation when testing against the values set for the criteria through the taking of samples, the conduct of analyses and the implementation of corrective action, in accordance with food law and the instructions</p>	Food Category	Microorganism	Sampling Plan		Limits		n	c	m	M	Milk powder and Whey powder*	Entero	5	0	10cfu/g		Coagulase – positive staph	5	2	10	100	<p><i>Microbiological levels in food which are not mandated in 2073/2005 would be governed by the application of GMP and HACCP procedures in EU production.</i></p> <p><i>Trade in food products should comply with established parameters which are based on HACCP principles.</i></p>
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Chinese National Standard GB/T 18738-2006 Instant soy milk powder and soy milk with dairy product powder	EU legislation	Implementing rules and comparative evaluation
<p>5.7 Food Additive and Food Nutrition Fortification Requirements The use of food additives and food nutrient fortification agents should comply with the provisions of GB2760 and GB14880</p>	<p>EU Regulation 1333/2008 set down the maximum limits of food additives which are permitted, by food category.</p> <p>Regulation (EC) No 1925/2006 of the European Parliament and of the Council of 20 December 2006 on the addition of vitamins and minerals and of certain other substances to foods. Annex I of the Regulation 1925/2006 is a list of vitamins and minerals which may be added to foods. Annex II is a list of the sources of vitamins and minerals which may be added to foods. Annex I and Annex II have been amended later on by three Commission Regulations to include additional substances: <u>Commission Regulation (EU) 2017/1203</u> <u>Commission Regulation (EU) No 119/2014</u> <u>Commission Regulation (EU) No 1161/2011</u> <u>Commission Regulation (EC) No 1170/2009</u></p> <p>Annex III is a list of substances other than vitamins or minerals whose use in foods is prohibited, restricted or under Community scrutiny. Annex III has been amended by Commission Regulation (EU) No 2015/403, prohibiting the use of Ephedra herb and its preparations from Ephedra species and subjecting Yohimbe bark and its preparations originating from Yohimbe (<i>Pausinystalia yohimbe</i> (K. Schum) Pierre ex Beille) to Community scrutiny (see below).</p> <p>Regulation 90/496 as amended Lays down rules on the nutritional labelling of foodstuffs and sets recommended daily allowance for certain vitamins and minerals.</p>	<p><i>Food fortification is defined as the practice of adding vitamins and minerals to commonly consumed foods during processing to increase their nutritional value. Vitamin and mineral substances may be considered for inclusion in the lists following the evaluation of an appropriate scientific dossier concerning the safety and bioavailability of the individual substance by the European Food Safety Authority (EFSA).</i></p> <p><i>Food business operators should submit requests for the inclusion of vitamins and minerals in the Annexes via the <u>E-submission Food Chain Platform</u>.</i> <i>- <u>Guidance document for competent authorities, tolerances for the control of compliance of nutrient values declared on a label with EU legislation</u> EN•••. (A simplified <u>summary table</u> EN••• gives an overview of the different tolerance values included in the guidance document. In case of doubt the guidance document text should be consulted as the official reference).</i></p>



Chinese National Standard GB/T 18738-2006 Instant soy milk powder and soy milk with dairy product powder	EU legislation	Implementing rules and comparative evaluation
<p>6 Test methods</p> <p>6.1 Sensory inspection</p> <p>6.1.1 Colour, appearance, impurities The sample to be tested shall be poured onto a white enamel plate and observed directly with the naked eye in natural light.</p> <p>6.1.2 Odour and taste Smell and taste.</p> <p>6.1.3 Potency Take 25g of the sample to be tested in a 500mL beaker, mix with 200mL of hot water above 70°C, stir with a glass rod for 1min and observe the dissolution.</p> <p>6.2 Net content deviation Weigh the mass using a balance with a sensitivity of 1g (remove the packaging).</p> <p>6.3 Physical and chemical tests</p> <p>6.3.1 Water content Determine according to the method specified in GB/T 5009.3.</p> <p>6.3.2 Protein Determination according to the method specified in GB/T 5009.5. The conversion factor of protein is 6.25.</p> <p>6.3.3 Fat Determined according to the method of GB/T 5413.3.</p> <p>6.3.4 Total sugar Determined according to the methods specified in GB/T 5009.7-2003 and GB/T 5009.8-2003, as follows.</p> <p>6.3.4.1 Principle After removing the proteins from the sample, sucrose is converted into reducing sugar by hydrochloric acid hydrolysis. Under heated conditions, a calibrated alkaline copper tartrate solution is titrated with hypromellose blue as indicator and the total sugar content is calculated according to the volume of the sample solution consumed.</p> <p>6.3.4.2 Reagents According to GB/T 5009.7-2003 in chapter 3 and GB/T 5009.8-2003 in chapter 4 of the method of preparation.</p>	<p>No need to compare to specific EU requirements.</p> <p>Regulation 2017/625 Art 34, Chapter IV would be relevant under EU legislation.</p> <p>Art. 34 Chapter IV of Regulation (EU) 2017/625 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules (consolidated version 28.10.2021) lays down rules on methods used for sampling, analyses, tests and diagnoses. In addition, Annex III of this regulation details the characteristics of methods of analysis</p> <p>Relevant ISO standards would also apply.</p>	<p><i>Equivalence between the Chinese laboratory methods and ISO standards should be clarified in advance of any trade. Should equivalence be determined then note should be taken of any differences in the limits for the various contaminants and microbiological indicators mentioned in the standard.</i></p> <p>Art. 34 Chapter IV of Regulation (EU) 2017/625 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules (consolidated version 28.10.2021) lays down rules on methods used for sampling, analyses, tests and diagnoses. In addition, Annex III of this regulation details the characteristics of methods of analysis</p>



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<p>6.3.4.3 Analytical procedures Weigh about 2.50g ~ 5.00g of the sample, placed in a 250mL volumetric flask, add 50mL of water, shake well and slowly add 5mL of zinc acetate solution and 5mL of potassium ferricyanide solution, add water to the scale, mix well, precipitate, stand for 30min, filter with dry filter paper, discard the initial filtrate, and set aside the filtrate. Add 5mL of hydrochloric acid (1+1) to a 250mL volumetric flask, heat in a water bath at 68°C~70°C for 15 min, cool, add 2 drops of methyl red indicator solution, neutralise with sodium hydroxide solution (200g/L), add water to the scale, mix well, then determine according to the steps 5.2, 5.3 and 5.4 in GB/T 5009.7-2003 Reducing sugar.</p> <p>6.3.4.4 Calculation of results The mass fraction Z of total sugars is calculated according to equation (1).</p> $Z = X \times 0.95 \times 5 \text{ (1)}$ <p>Where: Z - mass fraction of total sugars in the sample (in sucrose), %. X - mass fraction of reducing sugars (in glucose, calculated according to the method specified in Chapter 6 of GB/T 5009.7-2003) in the titrated sample, %. 0.95 - coefficient of conversion of reducing sugars (in glucose) to sucrose. 5 - the dilution multiple of the sample after acid hydrolysis.</p> <p>6.3.5 Ash content Determined by the method specified in GB/T 5009.4.</p> <p>6.3.6 Solubility Determined by the method specified in GB/T 5009.46-2003, 10.7.</p> <p>6.3.7 Sedimentation index</p> <p>6.3.7.1 Apparatus and equipment</p> <ol style="list-style-type: none"> Electronic constant speed stirrer. Drug balance. Pipette: 20mL. Measuring cylinder: 250mL. Beaker: 500mL. 		



Chinese National Standard GB/T 18738-2006 Instant soy milk powder and soy milk with dairy product powder	EU legislation	Implementing rules and comparative evaluation
<p>6.3.7.2 Analytical procedure Weigh 20.0 g of sample accurately, add 180 mL of distilled water at 60°C to a 500 mL beaker, place the beaker under an electronic constant speed stirrer, stir at a slow speed (150 r/min), add the weighed sample slowly, then stir at a fast speed (500 r/min) for 15 min, then aspirate 20.0 mL of test solution accurately into a 20 mL graduated test tube and leave for 30 min, read the millilitres of precipitate and carry out two parallel tests at the same time.</p> <p>6.3.7.3 Calculation of results The sedimentation index is calculated according to equation (2).</p> $Y=A/20 \text{ (2)}$ <p>where Y - the sedimentation index. A - the average of the two determinations of the number of millilitres of precipitation, in millilitres (mL).</p> <p>6.3.8 Total acid Determined by the method specified in GB/T 12456.</p> <p>6.3.9 Urease (urease) activity</p> <p>6.3.9.1 Quantitative determination method (arbitration method) Determination according to the method specified in GB/T 8622-1988.</p> <p>6.3.9.2 Qualitative determination method (conventional test method) Determination by the method specified in GB/T 5413.31.</p> <p>6.3.10 Total arsenic, lead, copper According to GB / T 5009.11, GB / T 5009.12 and GB / T 5009.13, respectively, the method of determination.</p>	<p>Regulation (EEC) No 315/93 laying down Community procedures for contaminants in food (consolidated version 07.08.2009)</p>	



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<p>6.4 Microbiological testing</p> <p>6.4.1 Total number of bacterial colonies According to the method of GB/T 4789.2 test.</p> <p>6.4.2 Coliform Test according to the method specified in GB/T 4789.3.</p> <p>6.4.3 Pathogenic bacteria (Salmonella, Shigella, Staphylococcus aureus) Salmonella, Shigella and Staphylococcus aureus are tested according to the methods specified in GB/T 4789.4, GB/T 4789.5 and GB/T 4789.10 respectively.</p> <p>6.4.4 Moulds</p>	<p>Commission regulation (EC) 2073/2005 on microbiological criteria for foodstuffs sets limits for milk powder and whey powder.</p> <p>There are no specific microbiological limits set for the products covered in the scope of this standard with the exception of “dairy product powder:</p> <p>EU legislation in the context of food safety criteria would require the absence of pathogens in food.</p>	
<p>7 Inspection rules</p> <p>7.1 Batch The same shift, the same species, the same specification of the product as a batch.</p> <p>7.2 Sample size Samples shall be taken randomly from each batch at a rate of one ten thousandth of the mass, with a minimum sample size of not less than 1.5kg.</p> <p>7.3 Factory inspection</p> <p>7.3.1 The factory inspection items include sensory, net content, moisture, protein, urease (urease) activity, total bacterial count and coliform.</p> <p>7.3.2 Each batch shall be inspected by the inspection department of the production plant in accordance with the methods specified in this standard and a certificate of conformity shall be issued before leaving the factory.</p> <p>7.4 Type inspection</p> <p>7.4.1 The type of inspection items include all items specified in this standard.</p> <p>7.4.2 Every six months the product shall be subject to a type test.</p>	<p>Regulation (EC) No 852/2004, Article 5 (f) establishing procedures, which shall be carried out regularly, to verify that the measures outlined in subparagraphs (a) to (e) are working effectively;</p> <p>The verification of effective self-controls is a key objective of official controls in food establishments:</p> <p>Regulation (EU) 2017/625, Article 14 Official control methods and techniques shall include the following as appropriate:</p> <p>(a) an examination of the controls that operators have put in place and of the results obtained;</p> <p>(b) an inspection of:</p> <p>(i) equipment, means of transport, premises and other places under their control and their surroundings;</p> <p>(ii) animals and goods, including semi-finished goods, raw materials, ingredients, processing aids and other products used for the preparation and production of goods or for feeding or treating animals;</p> <p>(iii) cleaning and maintenance products and processes;</p> <p>(iv) traceability, labelling, presentation, advertising, and relevant packaging materials including materials intended to come into contact with food;</p> <p>(c) controls on the hygiene conditions in the operators’ premises;</p> <p>(d) an assessment of procedures on good manufacturing practices, good hygiene practices, good farming practices, and of procedures</p>	<p><i>Guidance document</i> Commission Notice 2016/C 278/01 provides that adequate infrastructure and resources must be provided to develop, organise, and execute efficient self-controls.</p> <p>3.1 Assembly of a multidisciplinary HACCP team This team, which involves all parts of the food business concerned with the product, should include the whole range of specific knowledge and expertise appropriate to the product under consideration, its production (manufacture, storage, and distribution), its consumption and the associated potential hazards and should also involve as much as possible the higher management levels. The team should get the full support of the management who should consider itself owner of the HACCP plan and overall Food Safety Monitoring System.</p>



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<p>7.4.3 The type test shall also be carried out in the event of one of the following.</p> <ul style="list-style-type: none"> - changes in raw materials - changes in the process - resume production after a long hiatus. - Ex-factory inspection and the last type test has a large difference: -the national quality supervision agencies proposed to carry out the type test. - The national quality supervision agency to carry out the type test requirements. <p>7.5 Judgement rules</p> <p>7.5.1 The test results of all items in line with the provisions of this standard, the batch of products judged to be qualified.</p> <p>7.5.2 Microbiological indicators in a test result does not meet the requirements of this standard, the batch of products is judged to be unqualified.</p> <p>7.5.3 In addition to microbiological indicators, if the test results of other items do not meet the requirements of this standard, the original batch of products may be double sampled and retested once, and the decision shall be based on the results of the retest, and if there is still an indicator failure, the batch of products shall be judged as unqualified.</p>	<p>based on the principles of hazard analysis critical control points (HACCP);</p> <p>(e) an examination of documents, traceability records and other records which may be relevant to the assessment of compliance with the rules referred to in Article 1(2), including, where appropriate, documents accompanying food, feed and any substance or material entering or leaving an establishment;</p> <p>(f) interviews with operators and with their staff; (g) the verification of measurements taken by the operator and other test results;</p> <p>(h) sampling, analysis, diagnosis, and tests;</p> <p>(i) audits of operators;</p> <p>(j) any other activity required to identify cases of non-compliance.</p> <p>EU Reg. 2073/2005 lays down detailed rules regarding the microbiological criteria for foodstuffs. It specifies among other things, the type of test, the analytical methods, the number of samples, the frequency of testing (in some cases) and the interpretation of the results and subsequent corrective action(s), where necessary</p>	
<p>8 Labelling, packaging, transport and storage</p> <p>8.1 Labelling</p> <p>8.1.1 The labelling of pre-packaged products should comply with the provisions of GB7718 and should also indicate the type of product.</p> <p>8.1.2 The name of the product should be marked in accordance with the provisions of Chapter 3.</p> <p>8.1.3 The type of product should be marked according to the provisions of Chapter 4 (e.g.: Type xx xx).</p>	<p>The EU Food Information to Consumers Regulation No 1169/2011 (FIC) covers the general food labelling and nutrition information requirements for pre-packed foods. General food labelling includes areas such as the name of the food, ingredients lists and allergen information.</p> <p>Annex VI Part A point 1</p> <p>The name of the food shall include or be accompanied by particulars as to the physical condition of the food or the specific treatment which it has undergone (for example, powdered, refrozen, freeze-dried, quick-frozen, concentrated, smoked) in all cases where omission of such information could mislead the purchaser.</p>	<p><i>The Food Business Operator should ensure the final product complies with the specific labelling requirements of the standard which may be additional to those specified in EU legislation</i></p>



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<p>8.2 Packaging Packaging materials and containers shall be clean, dry, non-toxic, odourless and in accordance with the corresponding food hygiene standards.</p>	<p>Regulation (EC) No 852/2004, Annex II, Chapter X, 1. Material used for wrapping and packaging are not to be a source of contamination. 2. Wrapping materials are to be stored in such a manner that they are not exposed to a risk of contamination. 3. Wrapping and packaging operations are to be carried out so as to avoid contamination of the products. Regulation (EC) No 852/2004, Annex II, Chapter IX 2. Raw materials and all ingredients stored in a food business are to be kept in appropriate conditions designed to prevent harmful deterioration and protect them from contamination. 3. At all stages of production, processing and distribution, food is to be protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state. 4. Adequate procedures are to be in place to control pests. Adequate procedures are also to be in place to prevent domestic animals from having access to places where food is prepared, handled, or stored (or, where the competent authority so permits in special cases, to prevent such access from resulting in contamination).</p>	<p><i>Equivalence</i></p>
<p>8.3 Transport The means of transport should be clean, dry and hygienic, and have sun and rain protection facilities.</p>	<p>Regulation (EC) No 852/2004, Annex II, Chapter IV 1. Conveyances and/or containers used for transporting foodstuffs are to be kept clean and maintained in good repair and condition to protect foodstuffs from contamination and are, where necessary, to be designed and constructed to permit adequate cleaning and/or disinfection. 2. Receptacles in vehicles and/or containers are not to be used for transporting anything other than foodstuffs where this may result in contamination. 3. Where conveyances and/or containers are used for transporting anything in addition to foodstuffs or for transporting different foodstuffs at the same time, there is, where necessary, to be effective separation of products.</p>	<p><i>There is broad equivalence in storage and transport requirements in both jurisdictions.</i></p>



Chinese National Standard GB/T 18738-2006 Instant soy milk powder and soy milk with dairy product powder	EU legislation	Implementing rules and comparative evaluation
<p>8.4 Storage The product should be stored in a dry, well-ventilated warehouse with rodent-proof facilities. It must not be mixed with toxic, harmful, odorous, corrosive, volatile or humid substances</p>	<p>Regulation (EC) No 852/2004, Annex II, Chapter IX, 2. Raw materials and all ingredients stored in a food business are to be kept in appropriate conditions designed to prevent harmful deterioration and protect them from contamination. 3. At all stages of production, processing and distribution, food is to be protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state</p>	



2.5 Chinese Food Safety Standard GB 31644-2018 National food safety standard -- Compound seasoning

Chinese National Standard GB 31644 Compound seasoning	EU legislation	Implementing rules and comparative evaluation
<p>Scope This standard applies to compound seasonings, including seasoned spirits, acidic seasoning liquid products, etc. This standard does not apply to aquatic condiments.</p>	<p>There is no commodity specific legislation in the EU for the types of foodstuffs covered by this standard.</p>	<p><i>There is no product specific hygiene legislation in the EU for the type of foodstuffs covered by this standard.</i> <i>However, general hygiene rules would apply as outlined in Reg.178/2002 and Reg. 852/2004.</i> <i>In addition, community legislation on contaminants, pesticides, labelling and GMO would apply.</i></p>
<p>2 Terms and definitions 2.1 Compound seasoning A product made from two or more seasonings, with or without the addition of auxiliary ingredients, which can be liquid, semi-solid or solid by the corresponding process.</p>	<p>No equivalent definition exists in EU food hygiene legislation.</p>	
<p>3 Technical requirements 3.1 Raw material requirements The raw materials shall comply with the corresponding food standards and relevant regulations</p>	<p>EU Regulation 852/2004</p>	<p><i>This is a catchall phrase which appears in many standards. Where standards exist for specific raw materials then the food business operator should ensure that the raw materials used in the production of the foodstuffs, covered in the scope of this standard, are complied with fully.</i></p>



Chinese National Standard GB 31644 Compound seasoning	EU legislation	Implementing rules and comparative evaluation										
<p>3.2 Sensory requirements The sensory requirements shall be in accordance with the provisions of Table 1. Sensory requirements.</p> <table border="1" data-bbox="136 379 904 778"> <thead> <tr> <th>Item</th> <th>Requirement</th> <th>Test method</th> </tr> </thead> <tbody> <tr> <td>Colour and lustre</td> <td>The colour and lustre of the product</td> <td rowspan="3">Take an appropriate amount of sample and place it in a clean beaker (for liquid products) or a clean white porcelain dish (for semi-solid or solid products) and observe the colour and condition under natural light. Smell, gargle with warm boiled water and taste.</td> </tr> <tr> <td>Taste and odour</td> <td>Taste and odour of the product, no odour, no smell</td> </tr> <tr> <td>Condition</td> <td>The product is in the condition it should be in, no mould, no foreign matter visible to the normal eye</td> </tr> </tbody> </table>	Item	Requirement	Test method	Colour and lustre	The colour and lustre of the product	Take an appropriate amount of sample and place it in a clean beaker (for liquid products) or a clean white porcelain dish (for semi-solid or solid products) and observe the colour and condition under natural light. Smell, gargle with warm boiled water and taste.	Taste and odour	Taste and odour of the product, no odour, no smell	Condition	The product is in the condition it should be in, no mould, no foreign matter visible to the normal eye	<p>There are no sensory requirements mandated in EU food hygiene legislation for the products mentioned in the scope of the standard. However, there is a general principle, in EU legislation which states that Odour, Colour and Taste must be “Acceptable to consumers and no abnormal change”. Sensory parameters are dealt with in the context of Good Manufacturing Practices and HACCP based procedures under EU rules</p>	<p><i>With the application of GMP and HACCP procedures in EU production it is envisaged that the end product would be equivalent in terms of sensory parameters.</i></p>
Item	Requirement	Test method										
Colour and lustre	The colour and lustre of the product	Take an appropriate amount of sample and place it in a clean beaker (for liquid products) or a clean white porcelain dish (for semi-solid or solid products) and observe the colour and condition under natural light. Smell, gargle with warm boiled water and taste.										
Taste and odour	Taste and odour of the product, no odour, no smell											
Condition	The product is in the condition it should be in, no mould, no foreign matter visible to the normal eye											
<p>3.3 Contaminant limits Contaminant limits should be in accordance with the provisions of GB2762.</p> <p>See Table 2 under</p>	<p>Commission Regulation 1881/2006 as amended by Regulation 2023/915 setting maximum levels for certain contaminants in foodstuffs.</p>	<p><i>The foodstuffs contained in this standard i.e. compound seasonings, including seasoned spirits, acidic seasoning liquid products, are not listed in Regulation 1881/2006 setting maximum levels for certain contaminants in foodstuffs. Food business operators may need to have the end product tested for the items in table two prior to trade and at a scientifically based frequency thereafter.</i></p>										
<p>3.4 Microbiological limits The limit of pathogenic bacteria should be in line with the provisions of GB29921</p>	<p>Microbiological limits There are no equivalent levels mandated in the EU food hygiene regulations. In the EU the quality of raw materials intended for food processing is governed by good manufacturing practices and HACCP based procedures whereby microbial limits are set for various microbes at intake and subsequent steps throughout the manufacturing process.</p>	<p><i>Testing in line with that specified in the standard may/would have to be carried out in the event of trade in these foodstuffs. The frequency of testing would need to be scientifically based.</i></p>										



Chinese National Standard GB 31644 Compound seasoning	EU legislation	Implementing rules and comparative evaluation
<p>3.5 Food additives The use of food additives should comply with the provisions of GB2760.</p> <p>See Table 3 under</p>	<p>EU Regulation 1333/2008 sets down the maximum limits of food additives which are permitted, by food category.</p> <p>See Table 3 under</p>	<p><i>Some food additives mentioned in the Chinese National Standard are not approved/do not appear in the EU while some EU approved additives are not mentioned in the Chinese National Standards. EU food business operators must ensure that only additives approved by Chinese Standards are used in products exported to China.</i></p> <p><i>The limits applicable under the Chinese standard will therefore depend on the food fillings used in the manufacture of the end product.</i></p>

Chinese National standard GB 29921	EU Regulation (EC) 2073/2005																				
<p>Microbiological parameters</p> <p>Table 1</p> <table border="1" data-bbox="125 742 1093 970"> <thead> <tr> <th>Compound Seasoning</th> <th>n</th> <th>c</th> <th>n</th> <th>M</th> </tr> </thead> <tbody> <tr> <td>Salmonella</td> <td>5</td> <td>0</td> <td>0</td> <td>-</td> </tr> <tr> <td>Staph Aureus</td> <td>5</td> <td>2</td> <td>100cfu/g</td> <td>1000cfu/g</td> </tr> <tr> <td>Vibrio parahaemolyticus</td> <td>5</td> <td>1</td> <td>100cfu/g</td> <td>1000cfu/g</td> </tr> </tbody> </table>	Compound Seasoning	n	c	n	M	Salmonella	5	0	0	-	Staph Aureus	5	2	100cfu/g	1000cfu/g	Vibrio parahaemolyticus	5	1	100cfu/g	1000cfu/g	<p>Regulation 2073/2005 does not contain compound seasonings, including seasoned spirits, acidic seasoning liquid products as a food category.</p>
Compound Seasoning	n	c	n	M																	
Salmonella	5	0	0	-																	
Staph Aureus	5	2	100cfu/g	1000cfu/g																	
Vibrio parahaemolyticus	5	1	100cfu/g	1000cfu/g																	

Chinese National Standard 2762	EU Regulation (EC) 1881/2006										
<p>Contaminants</p> <p>Table 2.</p> <table border="1" data-bbox="179 1209 1008 1342"> <thead> <tr> <th>Food Category</th> <th>Item</th> <th>Max Limit</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Condiment</td> <td>Lead</td> <td>1.0 mg/g</td> </tr> <tr> <td>Arsenic</td> <td>0.5 mg/kg</td> </tr> <tr> <td>3 chloro-1,2-propanediol</td> <td>0.4 mg/kg</td> </tr> </tbody> </table>	Food Category	Item	Max Limit	Condiment	Lead	1.0 mg/g	Arsenic	0.5 mg/kg	3 chloro-1,2-propanediol	0.4 mg/kg	<p>The foodstuffs contained in this standard i.e. compound seasonings, including seasoned spirits, acidic seasoning liquid products, are not listed in Regulation 1881/2006 as amended by Regulation 2023/915 setting maximum levels for certain contaminants in foodstuffs.</p>
Food Category	Item	Max Limit									
Condiment	Lead	1.0 mg/g									
	Arsenic	0.5 mg/kg									
	3 chloro-1,2-propanediol	0.4 mg/kg									



Chinese National Standard 2760		EU Regulation (EC) 1333/2008	
Additives Table 3. Food Category - Compound Seasoning		Additives Food Category 12.2.2 Seasonings and Condiments	
Item	Max Level mg/kg	Item	Max Level g/Kg
Neotame	0.012	Neotame	Not specifies in this food category
Silicon Dioxide	20.0	Silicon Dioxide	30
Calcium Silicate	GMP	Calcium Silicate	GMP
Sodium Alginate	GMP	Sodium Alginate	GMP
Carrageenan, Brilliant blue aluminium lake	0.01	Carrageenan, Brilliant blue aluminium lake	Not specifies in this food category
Tartrazine, tartrazine aluminium lake	0.1	Tartrazine, tartrazine aluminium lake	Not specifies in this food category
Lactitol	GMP	Lactitol	GMP
Sucralose	0.4	Sucralose	Not specifies in this food category
Diacetyl tartaric acid ester of mono (di) glycerides (DATEM)	0.001	Diacetyl tartaric acid ester of mono (di) glycerides (DATEM)	Not specifies in this food category
Calcium Stearate	20	Calcium Stearate	Not included in the Regulation
Potassium Stearate	20	Potassium Stearate	Not included in the Regulation
Spirulina blue(algae blue, lina blue)	0.8	Spirulina blue(algae blue, lina blue)	Not included in the Regulation

Note:

5 items [Neotame, Carrageenan, Brilliant blue aluminium lake, Tartrazine, tartrazine aluminium lake, Sucralose, Diacetyl tartaric acid ester of mono (di) glycerides (DATEM)]

are not specified in EU legislation for the food category that deals with seasonings and condiments.

3 items in the PRC standard [Calcium Stearate, Potassium Stearate, Spirulina blue(algae blue, lina blue)] are not mentioned in the EU regulation.

1 item has a lower limit [silicon dioxide] has a lower limit in the PRC than in the EU.

