

药食同源

Food-Medicine Homology

From traditional knowledge to market-ready products: a practical reference to regulation, evidence and commercial opportunity

- 01 China's food-medicine homology market: what the headline estimates measure
- 02 The catalogue and the rules: ingredient status, product categories and permitted use
- 03 2026 enforcement: implications for claims, labelling and online sales
- 04 Business models assessed by entry barriers and commercial potential
- 05 Beyond extract ratios: specifications and evidence for international markets



Organisers:



Co-Organiser:



Strategic Partner:



FROM THE EDITORS

One sector, three audiences: how to use this compendium

This compendium brings together the regulatory foundations, market evidence, product-development considerations and commercial pathways shaping China's food-medicine homology sector. It is designed for international companies assessing Chinese botanical ingredients, Chinese companies exploring overseas markets, and practitioners preparing for FOODMED 2026.

The report distinguishes official regulatory information from third-party market estimates. Market figures should always be read alongside their definition, source and period; apparently similar figures may measure different product sets or stages of the value chain.

Use the reading paths to navigate this modular handbook: start with the sections most relevant to your role, then follow the cross-references when a decision requires more detail. The regulatory and technical sections are general information, not a substitute for product-specific advice.

How this edition is sourced. Key factual claims and quantitative figures are linked to the numbered references on pages 37–38. Figures are labelled by source type. Where a market figure could not be traced to an original report with a clear definition and period, we have omitted it rather than repeat it without adequate support. Regulatory summaries should be checked against the current official text before a product decision.

A note on the term. “Food-medicine homology” is our English rendering of 药食同源 : a Chinese regulatory and cultural concept, not an internationally harmonised category.

— The Editors, FOODMED Industry Intelligence

HOW FIGURES ARE LABELLED

OFFICIAL DATA

Government notices and standards

THIRD-PARTY ESTIMATE

Not official statistics

COMPANY REPORTED

Company or institution disclosures

FORECAST

Projections, not results

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READING PATHS

IF YOU ARE	START	THEN
New to the sector	I Foundations	II Market → Pitfalls (p.31) → Entry playbook (p.30) → Glossary
Entrepreneur or brand builder	II Market	III Regulation → V Opportunity map & playbook
Chinese company going global	IV Four markets (p.22)	IV Specifications & evidence → V → VI
International food or nutrition company	I Two approaches	IV Ingredients → Four markets (p.22) → VI
Investor	II Data notes (p.9)	V Investment (p.32) → IV Specifications

THE ISSUE IN ONE PAGE

From ingredient access to competitive advantage: the role of evidence and standardisation

China’s food-medicine homology sector spans traditional ingredients, packaged foods, beverages and adjacent wellness categories. Its reported market size varies substantially across sources because the boundaries of the category are not consistently defined. Market figures cited by industry are third-party estimates, not official market statistics. Five considerations matter for companies:

- 1 Catalogue status is a starting point.** Permitted use depends on the exact substance and applicable conditions.
- 2 Product classification determines the regulatory route.** Ordinary food, health food and medicines are subject to different ingredient, claims and approval requirements.
- 3 Claims and online promotion require active controls.** Brands should review labels, e-commerce pages, livestream scripts and third-party promotions.
- 4 Product experience matters.** Taste, texture, convenience, price and consistency should be tested alongside any functional positioning.
- 5 International expansion requires market-specific evidence and regulatory assessment.** Acceptance in China does not establish acceptance elsewhere.



Traditional ingredients such as ginseng, lingzhi, jujube, goji and ginger. Catalogue status and permitted use differ by substance and must be checked individually.

“Traditional use is the starting point. Evidence and compliance determine what reaches the market.”

FIVE OFFICIAL
REFERENCE POINTS

106

substances on the food-medicine substance catalogue after the 2024 additions^{3,4,5,30}

1 Jan 2026

bone-and-joint health added to permitted health-food functions⁸

10 Apr 2026

six-month national campaign on false advertising in online food sales⁹

20 May 2026

rules on online food sellers' food-safety responsibilities in force¹⁰

16 Mar 2027

Food Labelling Supervision Measures and GB 7718-2025 take effect^{11,12}

PART I · FOUNDATIONS

Food-medicine homology: traditional use meets modern regulation

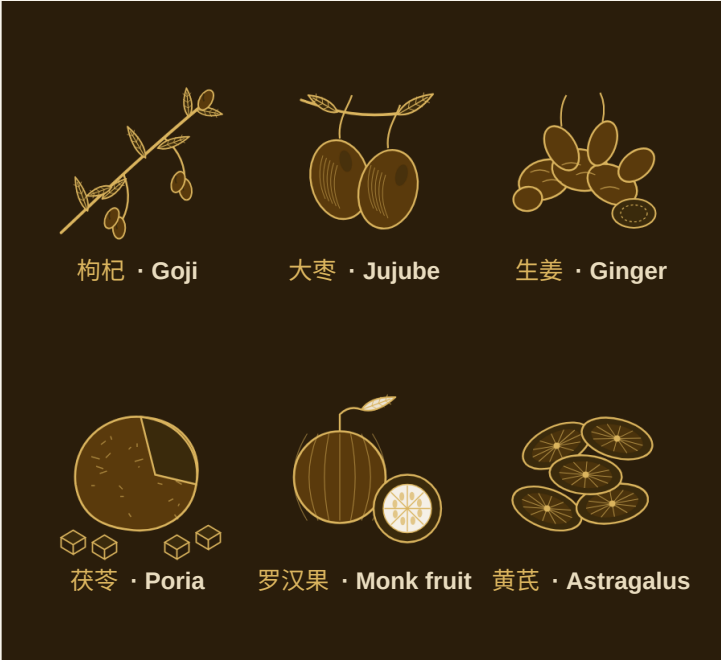
药食同源 (yào shí tóng yuán) is commonly translated as “food and medicine share a common origin.” In China, the phrase has cultural and historical significance, but commercial food use is governed by specific legal requirements.

China’s Food Safety Law prohibits adding medicines to food, while allowing substances that are traditionally both food and Chinese medicinal material, as listed by the authorities.¹ The **food-medicine substance catalogue** (食药物质目录) identifies substances that may be used as food under applicable conditions; the National Health Commission manages it under rules that set criteria for inclusion and allow it to be revised.²

Catalogue status does not authorise a food to claim that it prevents or treats disease. Nor does it remove the need to comply with food-safety, manufacturing, labelling and advertising requirements.

For product developers, the practical distinction is between the history of an ingredient and the legal status of a proposed finished product. Both must be assessed before launch: a long tradition of use does not settle the legal question, and a listed ingredient does not make a compliant product on its own.

The rest of this compendium follows that distinction. Part II looks at how the market is measured; Part III at the rules for ingredients, products and claims; Part IV at the specifications and evidence that make an ingredient usable; Part V at the business models built on all three.



Examples of traditional ingredients; catalogue status and permitted use must be checked individually.

IN ONE SENTENCE

Ingredient eligibility, finished-product compliance and claim eligibility are three separate questions.

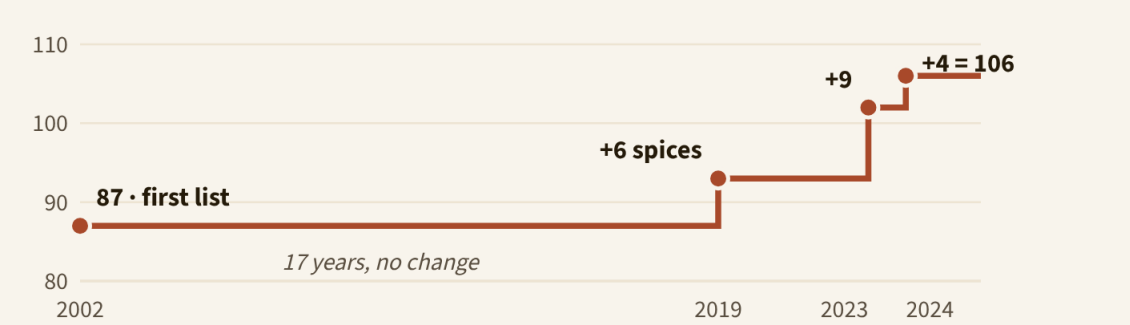
Sources: **1** Food Safety Law · **2** NHC catalogue rules 2021 — full references on pages 37–38.

THE CATALOGUE · 食药物质目录

The catalogue has expanded to 106 substances, with defined conditions of use

As of October 2026, the catalogue has expanded in four batches: 87 substances in 2002, six additions in 2019, nine in 2023 and four in 2024. Later announcements give more detailed specifications for certain substances, including botanical identity, plant part and applicable contaminant limits.^{3,4,5} The 2019 additions were restricted to use as spices and seasonings, so catalogue inclusion should never be read as unrestricted permission to use a substance in any food or at any level.

Substances on the catalogue, 2002–2024 **OFFICIAL DATA**



Source: cumulative count of substances in the four official batches.^{3,4,5,30}

BATCH	ADDED	SUBSTANCES AND CONDITIONS
2002	87	Base list (Annex 1 to 卫法监发〔2002〕51号). Names only. ³⁰
2019	6	Angelica, sand ginger, saffron, tsaoko, turmeric, long pepper — for use as spices and seasonings only . Publicised January 2020. ⁵
2023	9	Codonopsis, desert cistanche, <i>Dendrobium officinale</i> , American ginseng, astragalus, lingzhi, cornus, gastrodia, eucommia leaf. ³
2024	4	Rehmannia, ophiopogon, asparagus root, Huajuhong (化橘红). ⁴

BEFORE FORMULATING

- Listed — check the conditions**

A catalogue substance may be used as food within its stated identity, plant part, form and limits. Ordinary foods with an established history of food use are a separate matter.
- Not listed — a separate route may apply**

A substance outside the catalogue that lacks food status may need approval as a **new food ingredient** (新食品原料). Cultivated ginseng is an example: approved in 2012, with conditions set in the notice.⁷
- Never assume**

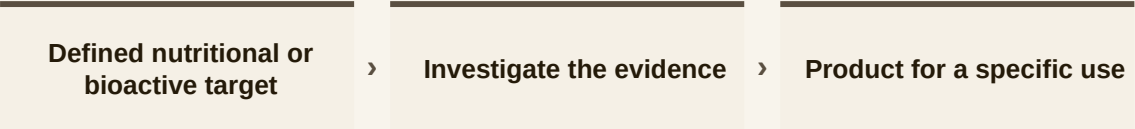
Do not use an unlisted TCM material in food, make disease or unauthorised function claims, or treat traditional use as legal authorisation.

 **Lingzhi:** the catalogue entry covers a defined part; lingzhi spore powder is not covered by the food-medicine substance catalogue.^{3,6} Confirm Chinese and Latin names, plant part, preparation, permitted use and limits in the relevant notice.

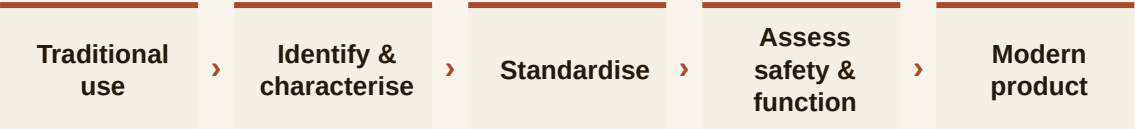
TWO APPROACHES · ONE DESTINATION

Two approaches to functional ingredients — and where they converge

TARGET-LED DEVELOPMENT



TRADITION-LED DEVELOPMENT (FOOD-MEDICINE HOMOLOGY)



➔ **Where they converge:** safe, consistent products supported by evidence appropriate to the intended use and market.



Functional-food development often begins with a defined nutritional or bioactive target and investigates whether the evidence supports a particular use. Food-medicine homology commonly begins with traditional use and an established ingredient context, then asks how identity, composition, safety and function can be characterised.

Neither approach belongs to one region or one regulatory system; companies everywhere use

both, and many products combine them. The approaches can converge in product development. Both require reliable sourcing, reproducible specifications, appropriate safety assessment, evidence proportionate to the intended claim and a viable consumer proposition. Traditional use can inform research priorities, but it does not by itself establish clinical efficacy or authorise a health claim.

“Traditional use can inform research priorities. It does not by itself establish efficacy or authorise a claim.”

WHY NOW

Five forces shaping demand for food-medicine homology products in China

Several developments may support interest in food-medicine homology products: consumer interest in wellness, new beverage and snack formats, expanding digital distribution, policy attention to nutrition and changing product-development capabilities. Their relative importance varies by category and consumer group.

Market estimates and consumer surveys suggest that the sector is attracting commercial attention, but the size

and pace of growth depend on the definition used. Online engagement should not be treated as proof of purchase or repeat purchase.

The same expansion in product variety and online promotion increases the importance of substantiated claims, accurate product information and oversight of third-party marketing.



Familiar botanicals are being used in new beverage and snack formats.

- 1

Consumer interest in wellness
Wellness positioning is visible across beverages, snacks and tonics. Interest varies by category and consumer group, and online engagement is not proof of purchase.
- 2

New beverage and snack formats
Large beverage companies have launched ready-to-drink herbal products; Master Kong introduced a new wellness-water brand, 神农养方, in June 2026, according to media reports.²⁸
- 3

Expanding — and more regulated — digital distribution
Online sales channels are now subject to specific seller-responsibility rules, in force from 20 May 2026.¹⁰
- 4

Policy attention to nutrition
Thirteen substances were added to the catalogue in 2023–24;^{3,4} the 2025–2030 national food and nutrition outline calls for widening food-medicine substances;²⁰ the NHC issued new dietary-guidance guidelines in 2026.¹³
- 5

Changing product-development capability
Universities, testing laboratories and ingredient suppliers increasingly offer characterisation, standardisation and formulation services (see Parts IV and VI).

PART II · THE MARKET

Market sizing: why published estimates differ so widely

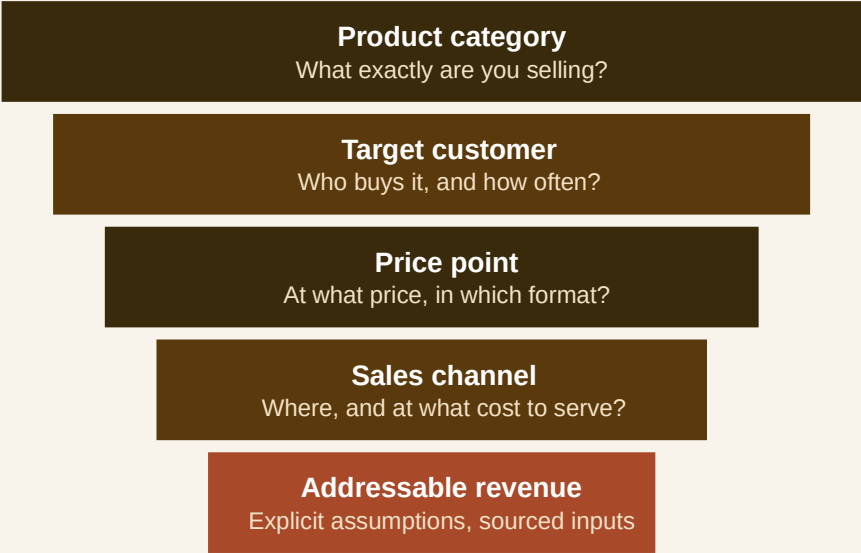
Published estimates of China’s food-medicine homology market vary widely. The difference may reflect the products included, the sales channels measured, the treatment of products containing catalogue ingredients and whether a study measures packaged products or a broader value chain. These figures should not be treated as interchangeable. Before using an estimate in a business plan, establish the market definition, measurement period, source, method and whether the number is an actual estimate or a forecast.

Several headline figures circulate widely in industry media and conference material. For this edition we could not trace them to an original report with a stated definition and method, so we do not reproduce them. Readers who wish to use such figures should obtain the original study and check its scope first.

For a business case, build a bottom-up estimate from a defined product category, target customer, realistic purchase frequency, price point and sales channel. State each assumption, show the calculation, and cite the source for every input. Use a broad sector estimate only as context—not as a substitute for a market model you can explain and defend.

Build the number from the bottom up

A defensible estimate starts with a defined product and traceable inputs—not a headline sector number



“Use a broad sector estimate as context — never as a substitute for a bottom-up market model.”

DATA NOTES · READ BEFORE YOU QUOTE A NUMBER

Many market measures, many different scopes: a guide to interpreting the data

Published measures related to this sector span several related but distinct markets, including the wider health industry, the food-medicine homology value chain, supplements, beverages, packaged products and online sales. Shown together, they

illustrate differences in scope — they are not directly comparable or additive.

Before quoting any measure, ask three questions: what does it include? Who produced the estimate, and how? Which year does it represent, and is it an actual or a forecast?

From broadest to narrowest: what different studies measure



Illustrative scopes only; values are omitted because definitions differ and several widely cited figures could not be traced to an original report.

THE GLOBAL PICTURE — A DIFFERENT CATEGORY

THIRD-PARTY ESTIMATE FORECAST

MarketsandMarkets estimates the global “Food as Medicine” market at **US\$254.15bn in 2026**, forecast to reach **US\$400.81bn by 2031** (CAGR 9.5%).²⁷

That provider’s scope covers products, functions, ingredients, sources, forms, channels and prescription types — including functional foods, medical foods, nutraceuticals and personalised nutrition.

This is a provider-defined global category, not a proxy for China’s food-medicine homology market. Do not compare the figures directly unless definitions, periods and methods are aligned.

THREE QUESTIONS FOR ANY NUMBER

- 1 What does it include — products, ingredients, or the whole chain?
- 2 Who produced the estimate, and from what data?
- 3 Which year, and is it an actual or a forecast?

Sources: ²⁷ MarketsandMarkets, Aug 2026 — full references on pages 37–38.

THE CONSUMER

Consumers express interest in function, but product experience may support repeat purchase

Online discussions and product reviews offer different signals. Discussion can indicate consumer interest in functional positioning; reviews can reveal what purchasers choose to comment on after trying a product. Neither source alone establishes what causes purchase or repeat purchase.

Industry review analyses circulating in 2026 report that taste, texture and convenience are frequent themes in reviews, while health effects are mentioned less often. We do not reproduce their percentages here: sample size,

platforms, dates and coding rules were not available. Treat such findings as characteristics of the sampled reviews — not as a representative measure of all consumers or proof of what drives repeat purchase.

For product teams, the implication is to test sensory quality, convenience, price and repeat purchase alongside the regulatory and evidence requirements for any functional positioning.

Three signals, three different questions

SIGNAL	WHAT IT CAN SHOW	LIMITATION
Online discussion	Indicates interest in functional positioning	Does not show who buys, or why
Product reviews	Show what purchasers choose to comment on after trying a product	Sampled reviews are not representative of all consumers
Purchase and repeat data	Show what consumers actually do	Needs your own channel data or a defined panel



Familiar ingredients in everyday formats.

TEST BEFORE YOU SCALE

- Sensory quality — taste, aroma, texture
- Convenience and format
- Price and pack size
- Consistency from batch to batch
- Repeat purchase in a defined channel

“Functional positioning may attract attention; product experience helps determine whether consumers return.”

FORMATS

From traditional tonics to ready-to-drink beverages and convenient snacks



The beverage shelf is where many familiar botanicals now reach consumers.

Traditional tonics and gift formats remain part of the category, while newer products apply familiar botanicals to ready-to-drink beverages, teas and snacks. These formats may broaden occasions of use, but commercial performance differs by brand, channel and price point.

Market reports describe rapid growth in selected wellness-water and herbal-tea categories. Those estimates need to be interpreted within each provider’s product definition and forecast assumptions; they do

Traditional tonics and gift formats

Slices, pastes and gift boxes sold through pharmacies, heritage brands and gifting.

Key question: Pack, price and occasion; claims discipline in gifting copy

Ready-to-drink herbal waters

Bottled drinks using familiar botanicals. Large beverage companies have entered; Master Kong launched 神农养方 in June 2026, according to media reports.²⁸

Key question: Taste, stability, cost — and a crowded shelf

Herbal teas

Bagged, instant and tea-shop formats.

Key question: Ingredient identity and contaminant control

Snacks

Sesame balls, poria cakes, gummies and bars.

Key question: Sugar, texture, shelf life

Pet nutrition

Familiar botanicals applied to pet foods and supplements.

Key question: Separate pet-food rules apply

not establish the growth rate of the entire food-medicine homology sector, and we have not reproduced figures we could not trace to source.

For product developers, the key questions are whether the format delivers acceptable taste, stability, convenience, cost and regulatory compliance — and whether consumers buy it again.

COMPETITION

A fragmented market may create room for differentiated brands — but the opportunity is unproven

Industry studies indicate relatively low concentration among the leading firms. That result may suggest a fragmented competitive landscape, but concentration alone does not establish low brand awareness, attractive margins or a low-cost route to market. We have not reproduced published share figures because the underlying dataset and denominator could not be confirmed.

Participants span traditional Chinese medicine companies, food and nutrition businesses, newer consumer brands, ingredient suppliers and pet-nutrition companies. Their total corporate revenues are indicators of organisational scale, not direct measures of food-medicine homology sales.

Potential differentiation may come from the levers on the right. Each requires separate commercial validation.

Who participates

Participant groups, with illustrative examples — not a ranking, and not category sales

- 1

Traditional Chinese medicine companies
Tongrentang · Dong-E E-Jiao · Yunnan Baiyao · Baiyunshan · CR Jiangzhong · Pien Tze Huang
- 2

Food and nutrition businesses
Yili · Mengniu · Nongfu Spring · Master Kong · Haoxiangni · Seamild
- 3

Newer consumer brands
Genki Forest · BuffX · ffit8 · Boohee and others
- 4

Ingredient suppliers
Botanical extract and ingredient makers; contract manufacturers
- 5

Pet-nutrition companies
Gambol · Zhongchong · Nourse and others

Examples are illustrative. Total corporate revenue is not a proxy for food-medicine homology sales.

POTENTIAL DIFFERENTIATION LEVERS

- Ingredient quality

Sourcing

Formulation

Sensory performance

Quality systems

Evidence

Brand positioning

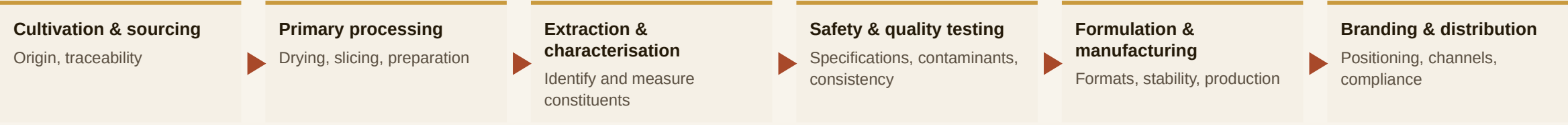
Distribution

THE VALUE CHAIN

The value chain: where capabilities, margins and entry opportunities sit

The value chain spans cultivation and sourcing, primary processing, extraction, characterisation, safety and quality testing, formulation, manufacturing, branding and distribution. Each stage has different capital needs, technical requirements, regulatory exposure and routes to revenue.

New entrants can participate through sourcing, ingredient distribution, contract manufacturing, testing, regulatory services or brand development. The most suitable entry point depends on capabilities, access to customers, working capital and the ability to meet relevant quality and compliance requirements — including GAP, GMP or other certifications where a scheme requires them.

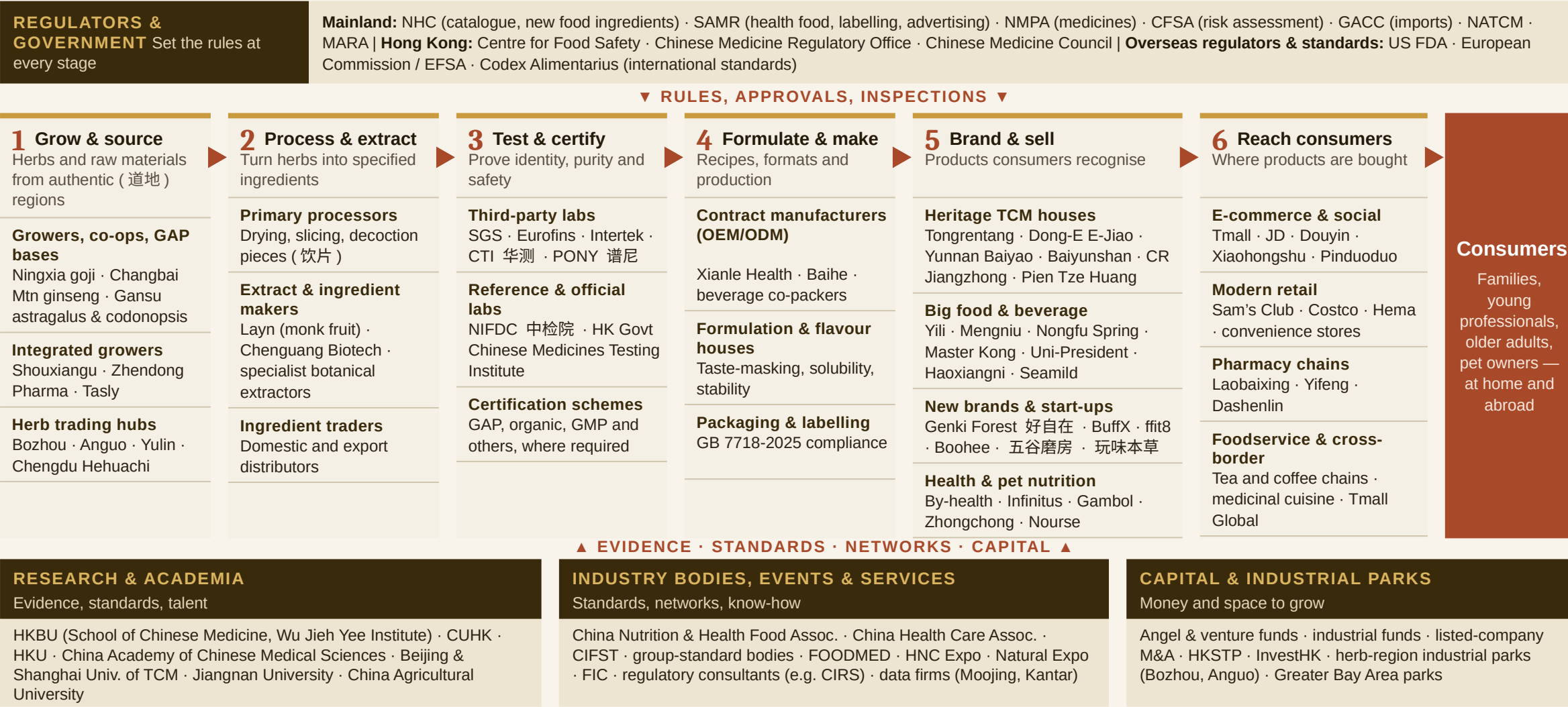


PLAYER	ROLE	POTENTIAL REVENUE MODEL	POSSIBLE ENTRY POINT
Growers, co-ops	Cultivation and primary processing	Raw-material sales; possible origin premium	Sourcing, aggregation, online raw-material sales
Extract & ingredient makers	Specified ingredients with defined markers	Ingredient sales; supply agreements	Trading, then distributing specified grades
Contract manufacturers (OEM/ODM)	Format development, scale production	Processing and formulation fees	Small runs; co-developed products
Brand owners	Product definition, marketing, customer relationships	Product sales; repeat purchase	One well-tested product
Channels & retail	E-commerce, retail, pharmacy, private domain	Channel margin; platform fees	Distribution or channel operation
Testing & research bodies	Composition testing, safety, human studies	Testing fees; research contracts; licensing	Partnership with a qualified laboratory or university
Regulatory consultants	Registration, filing, labels, cross-border rules	Service fees; retainers	Specialise in one category
Capital & industrial parks	Early-stage funding; park support	Equity returns; investment promotion	Early brands and service firms

THE ECOSYSTEM AT A GLANCE

The food-medicine homology ecosystem: from raw materials to market

Organisations shown are illustrative examples — not exhaustive; inclusion does not imply endorsement or confirm a specific regulatory capability. Identify the competent authority for each ingredient, product and market.



PART III · REGULATION

Product classification comes first: ingredients, claims and market-access pathways

The same botanical ingredient may be used in products subject to different regulatory regimes. The applicable pathway depends on the ingredient’s legal status, the finished product’s classification, its intended use and the claims made.

Ordinary food (普通食品) must comply with food-safety and labelling requirements and must not make unauthorised health or disease claims.

Health food (保健食品 , the “blue hat”) is subject to its own registration or filing framework and may make only permitted claims under applicable conditions.

Products regulated as **medicines** follow the relevant medicinal-product pathway.

Foods for special medical purposes (特殊医学用途配方食品) and infant formula are separate special-food categories with their own registration requirements; they are outside this comparison.¹

Determine the category before finalising the formulation, label or marketing strategy.

Three regulatory categories compared

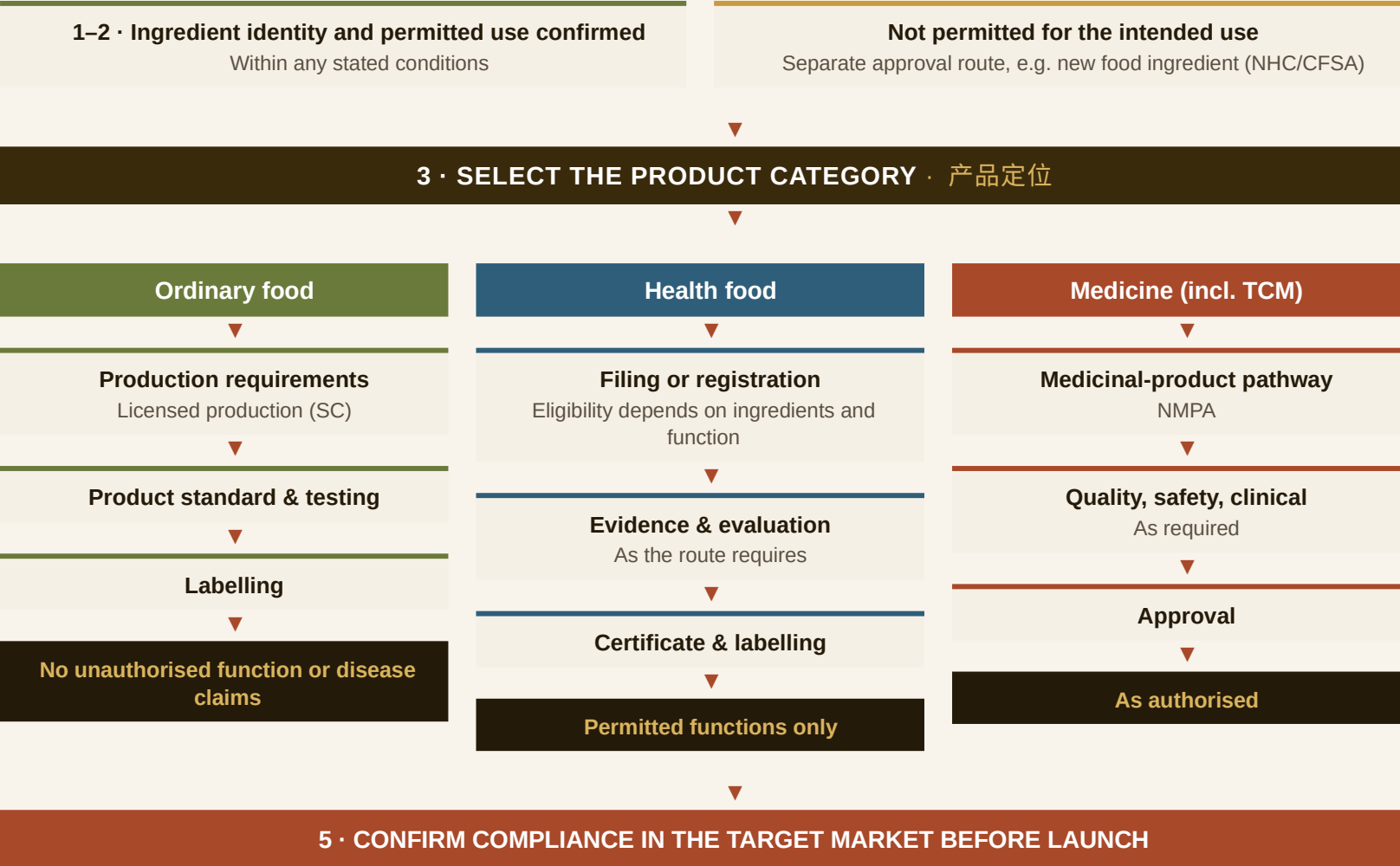
Indicative only; product-specific route and timing must be confirmed

	ORDINARY FOOD	HEALTH FOOD	MEDICINE
Regulatory basis	Food-safety and labelling law; production licence (SC)	Health-food registration or filing framework	Medicinal-product rules (NMPA)
Ingredients	Food-status ingredients, incl. catalogue substances within their conditions and approved new food ingredients	Ingredients permitted for health food; eligibility for filing depends on the raw-material catalogue	As authorised for the medicinal product
Claims	No unauthorised health-function or disease claims	Only permitted functions, under applicable conditions ⁸	As authorised for the medicinal product
Route and timing	Indicative only — product-specific	Indicative only — filing and registration differ in eligibility and evidence	Indicative only — product-specific

“Determine the category before finalising the formulation, the label or the marketing plan.”

DECISION PATHWAY

Market-entry decision pathway: confirm ingredient status, then product category



Ingredient approval and finished-product classification are separate decisions. Approval under one route should not be assumed to authorise another product form or claim.

- 1 Confirm ingredient identity**
Species, plant part, form and any conditions
- 2 Check permitted use**
Permitted for the intended food use, or is a separate approval route needed?
- 3 Select the product category**
Ordinary food, health food or medicine
- 4 Establish requirements**
Production, testing, labelling and claims
- 5 Confirm the target market**
Compliance where the product will be sold, before launch

HONG KONG

General food and proprietary Chinese medicine are separate regimes; proprietary Chinese medicines require registration under the Chinese Medicine Ordinance. Classification depends on the product's ingredients, form and claims and should be confirmed case by case.

TWO CATALOGUES — AND A THIRD ROUTE

One ingredient, different regulatory lists: why status and permitted use matter

The **food-medicine substance catalogue** (食药物质目录) and the **health-food raw-material catalogue** (保健食品原料目录) serve different regulatory purposes. The first concerns whether specified substances may be used as food under stated conditions. The second relates to ingredients that may be used in health food under the applicable filing framework.

New food ingredient (新食品原料) approval is a separate route for substances that are not already

permitted for the proposed food use. The applicable notice must be checked for conditions and restrictions.

The health-food lists continue to evolve. In July 2026 SAMR published draft rules, for public comment, on registering and filing health foods that use probiotic raw materials — a draft, not an enacted rule.¹⁴

The examples on the right show why the precise species, part and form matter.

Worked examples



Cultivated ginseng 人参

Approved in 2012 as a new resource food (now “new food ingredient”) for ginseng cultivated for five years or less; the notice also sets intake and unsuitable-population conditions, which must be checked in the notice itself.⁷



American ginseng 西洋参

Added to the food-medicine substance catalogue in 2023.³



Lingzhi 灵芝 — fruiting body vs spore powder

Lingzhi was added to the catalogue in 2023.³ Lingzhi spore powder is a different part and is not covered by the food-medicine substance catalogue.^{3,6} Broken-wall spore powder is instead on the health-food raw-material catalogue (since 2020)³² and has its own recommended national standard, GB/T 48276-2026.^{31,33}



Angelica 当归

Added in 2019 for use as a spice or seasoning only — not as a general food ingredient in, for example, a tonic drink.⁵

“Check the species, the plant part and the form — not just the name.”

Sources: ³ NHC/SAMR 2023 No. 9 · ⁵ NHC/SAMR 2019 No. 8 · ⁶ CFSA training (Sohu report) · ⁷ MoH 2012 No. 17 · ¹⁴ SAMR probiotic draft, 24 Jul 2026 · ³¹ SAMR standards platform record · ³² SAMR/NHC/NATCM 2020 No. 54 · ³³ Xinhua, 10 Oct 2026 — full references on pages 37–38.

HEALTH FOOD · 保健食品

China’s health-food system: filing, registration and permitted claims

China has a substantial base of registered and filed health-food products. Filing and registration are distinct pathways with different eligibility criteria and evidence requirements; the applicable route depends on the ingredients, the function and the product circumstances. (Official certificate counts should be taken from SAMR’s current database; we do not reproduce secondary summaries.)

Health foods may make only claims permitted under the applicable framework. The permitted-function catalogue is updated from time to time: on 18 December 2025 SAMR, the NHC and the National Administration of Traditional Chinese Medicine announced the addition of

“helps maintain bone and joint health,” in force from 1 January 2026, together with technical guidance on its evaluation.⁸

Claims outside that framework — including disease-treatment claims — should not be inferred from traditional use or dietary guidance. The NHC’s 2026 dietary-guidance guidelines give advice on eating; they are not product-claim authorisations.¹³

A positive policy response to a proposal is not the same as a final rule. Any proposed route involving food for special medical purposes should be treated as pending until the relevant rules are formally issued.

Filing or registration?

Indicative logic only — eligibility depends on the applicable rules

Are all functional ingredients on the health-food raw-material catalogue, used within its conditions?	
Yes → Filing 备案 Product technical requirements and testing, under the catalogue’s conditions.	No → Registration 注册 Safety, function and quality evaluation as required. Some imported products also require registration.

BEFORE YOU CHOOSE A ROUTE

- Confirm the exact function wording you intend to claim
- Check every ingredient’s status and conditions
- Plan the evidence the route requires
- Confirm timing case by case — it is not standard

Sources: ⁸ SAMR/NHC/NATCM, 18 Dec 2025 · ¹³ NHC dietary guidance 2026 — full references on pages 37–38.

CLAIMS AND ENFORCEMENT

2026 enforcement: implications for claims and online food sales

The legal distinction between ordinary food and health food remains important: ordinary food must not make unauthorised health-function or disease-treatment claims. In 2026, regulatory attention to online food sales and promotion increased through several separate initiatives, set out on the right.

Brands should review product labels, product pages, livestream scripts, influencer content, agency materials and reseller communications. Contracting with a third party does not remove

the need to manage compliance risks associated with how a product is promoted.

The practical response is a documented claims-review process, clear approved wording, staff and partner training, version control and post-launch monitoring.

Each initiative has its own legal status: a campaign notice directs enforcement; an order sets binding obligations from its effective date; a work plan sets priorities. Read each source for what it actually requires.

SEPARATE INITIATIVES, SEPARATE SOURCES

10 April 2026

SAMR General Office notice on a six-month national campaign against false advertising in online food sales, covering online sales, livestream commerce and misleading claims. An enforcement campaign, not a new law.⁹

20 May 2026

SAMR Order No. 124 on online food sellers’ food-safety responsibilities takes effect; it prohibits false or misleading commercial promotion by online food sellers.¹⁰

May 2026

SAMR, MIIT and MCA launch a campaign on health food for older consumers, targeting false promotion including livestream and private-domain selling.¹⁹

16 March 2027

Food Labelling Supervision Measures take effect.¹¹

PRACTICAL GUIDE · ORDINARY FOOD

Ordinary-food claims: what to review before publication

Potentially lower-risk descriptions generally focus on verifiable product attributes: ingredient identity, origin, taste, texture, format, traceability and factual quality information. Even these statements must be accurate and must not create a misleading health implication.

Disease-treatment language and unauthorised health-function claims should not be used for ordinary foods.^{1,11} Terms such as “nourishing,” “balance” or “lightness” may need contextual review if consumers could understand them as physiological effects.²⁹

GENERALLY FACTUAL DESCRIPTIONS	DO NOT USE FOR ORDINARY FOOD	REQUIRES CONTEXT-SPECIFIC LEGAL REVIEW
✓ Ingredient identity — what the product contains, in what amount	✗ Disease-treatment or prevention language	? Terms such as “nourishing”, “balance” or “lightness” where consumers could understand a physiological effect
✓ Origin and traceability, where documented	✗ Health-function claims not authorised for the product	? Traditional-use statements and how they are framed
✓ Taste, texture and format	✗ Claims implying clinical proof for an ordinary food	? Influencer, livestream and reseller wording
✓ Factual quality information, e.g. testing performed	✗ Dietary guidance or traditional theory presented as a treatment claim	

Before launch. Maintain approved wording for labels, websites, livestreams and third-party promotions, with version control.

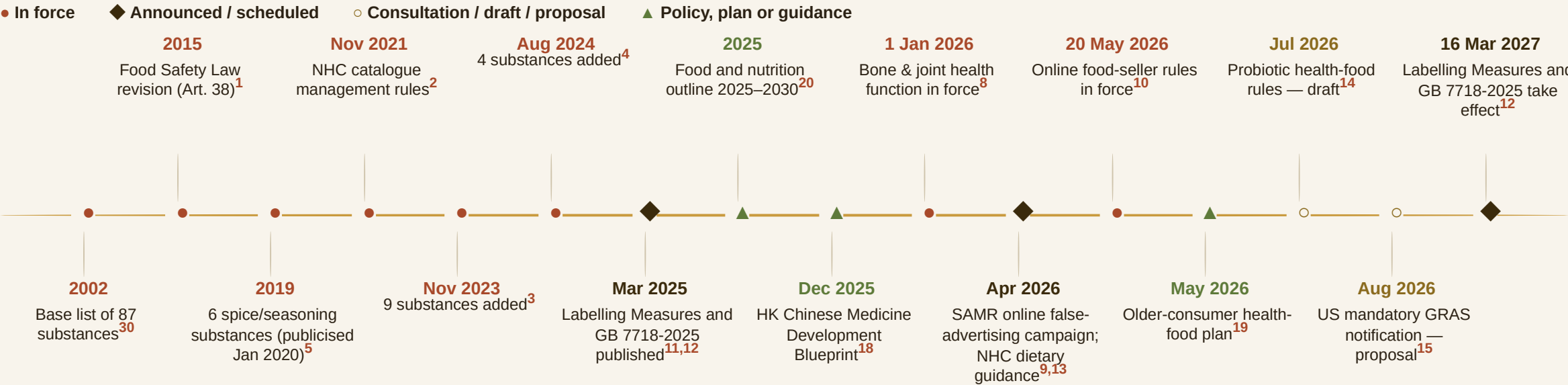
After launch. Monitor reseller pages and promotional content, and correct non-compliant statements promptly.

General information, not legal advice. No phrase is automatically lawful or unlawful; assessment depends on the product, context, channel and applicable jurisdiction. Confirm product classification, ingredient eligibility, claims and labelling against current official requirements, and obtain qualified local legal or regulatory review before launch.

KEY MILESTONES

Key regulatory milestones affecting food-medicine homology

A navigation aid, not a complete legal chronology. Dates are publication or effective dates as marked.



LABELLING 2027

Two instruments, one date

Review every label element against the final texts.

The Food Labelling Supervision Measures (SAMR Order No. 100), promulgated on 14 March 2025, take effect on 16 March 2027.¹¹ The revised national standard GB 7718-2025 for prepackaged-food labels, released on 27 March 2025, is also implemented from 16 March 2027.¹²

The two are different instruments: an administrative measure and a national food-safety standard. Detailed labelling requirements should be confirmed against the standard text itself, not summaries.

Sources: **1** Food Safety Law · **2** NHC catalogue rules 2021 · **3** NHC/SAMR 2023 No. 9 · **4** NHC/SAMR 2024 No. 4 · **5** NHC/SAMR 2019 No. 8 · **8** SAMR/NHC/NATCM, 18 Dec 2025 · **9** SAMR 市监特食发〔2026〕33号 · **10** SAMR Order No. 124 · **11** SAMR Order No. 100 · **12** NHC/SAMR 2025 No. 2 (GB 7718-2025) · **13** NHC dietary guidance 2026 · **14** SAMR probiotic draft, 24 Jul 2026 · **15** FDA proposed rule, 11 Aug 2026 · **18** HKSAR Govt, 18 Dec 2025 · **19** Older-consumer campaign (CNR media report) · **20** Nutrition outline 2025–2030 · **30** MoH 卫法监发〔2002〕51号 — full references on pages 37–38.

PART IV · SCIENCE & PRODUCT DEVELOPMENT

From ingredient status to a compliant product

A botanical ingredient’s traditional use, legal status and evidence base are different questions. Product development should begin by defining the intended product and market, confirming ingredient admissibility, and establishing the quality and safety requirements that apply to the proposed use.

The regulatory route should shape — not follow — the final formulation and marketing claims. The same product may fall into a different category in each market, so classification has to be assessed market by market. The table is a simplified orientation, not an official classification.



Hong Kong operates its own regulatory regime alongside mainland and international rules.

	CHINESE MAINLAND	UNITED STATES	EUROPEAN UNION	HONG KONG
Key routes	Ordinary food (incl. catalogue substances within conditions); new food ingredient; health food (filing or registration); medicine	Food ingredients may need a safety pathway such as GRAS; dietary supplements follow a separate framework	Food; authorisation required for novel foods under Regulation (EU) 2015/2283 ¹⁶	General food; proprietary Chinese medicine (registration under the Chinese Medicine Ordinance); pharmaceutical products
Claims	Ordinary food: no unauthorised function or disease claims. Health food: permitted functions only	Supplement structure/function claims have specific requirements	Health claims are subject to the EU authorisation system	Medical claims for food are restricted; confirm case by case
Watch in 2026	Online-sales enforcement; labelling changes from 16 Mar 2027 ^{9,11}	Proposed rule (published 11 Aug 2026) to make GRAS notification mandatory — a proposal, not law ¹⁵	Novel-food status checks for less familiar botanicals and extracts	Chinese Medicine Development Blueprint (18 Dec 2025) ¹⁸

INTO CHINA

Overseas producers of imported food must register with China Customs under GACC Decree 248, in force since 1 January 2022.¹⁷ Labels and product categories must meet Chinese requirements.

OUT OF CHINA

Status on China’s catalogue says nothing about status abroad. Check food-use history, category and claim rules in each target market before investing.

SPECIFICATIONS

Build a specification before building a claim

A usable ingredient specification should identify the botanical source, species, plant part, preparation and extraction process; define relevant identity and composition tests; establish contaminant limits and quality criteria; and describe the methods used to assess batch consistency.

A specification should be fit for the ingredient’s intended use and target market. One marker compound or extract

ratio may be useful, but neither alone establishes equivalence, safety or efficacy. An extract ratio such as “10:1” describes how much raw material went into the extract; it does not describe what the extract contains.

The same ingredient can behave differently in different products, so specification and formulation are best developed together.

“One marker compound or extract ratio may be useful — but neither alone establishes equivalence, safety or efficacy.”

Elements of a usable specification

- 1 Botanical source & identity**
Species, plant part, preparation and extraction process
- 2 Identity & composition tests**
Methods appropriate to the ingredient
- 3 Contaminant limits & quality criteria**
As set by applicable rules and the buyer
- 4 Batch consistency**
How variation is assessed and controlled
- 5 Release criteria**
What each batch must meet before it ships

Framework for discussion. Mandatory limits come from applicable national standards and rules; other criteria are recommended quality controls or buyer-defined purchasing specifications.

EVIDENCE AND CLAIMS

Match the evidence to the product and the intended claim

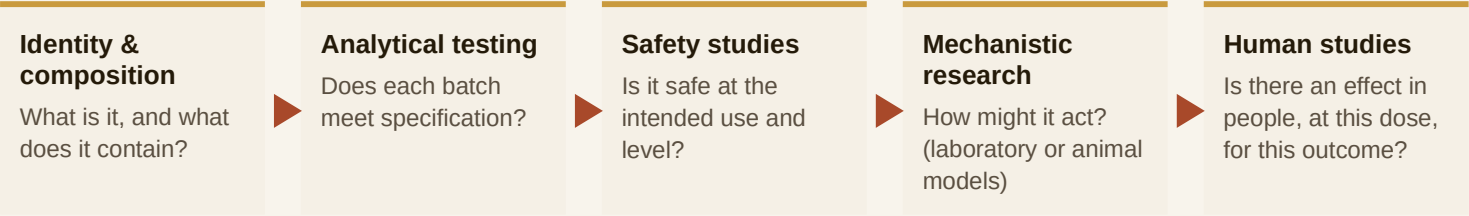
Evidence can include identity and composition data, analytical testing, safety studies, mechanistic research and human studies where appropriate. These evidence types answer different questions and should not be treated as interchangeable.

Evidence for one extract, dose, preparation or population may not support a different finished product or a broad claim about

the entire botanical species. The evidence plan should be designed around the product’s intended use, regulatory category and target market.

Laboratory and animal findings do not demonstrate a benefit in people. Traditional use can suggest questions worth testing; it does not answer them.

Five evidence types, five different questions



Characterisation and testing come before any claim.

Examples of active research topics

Topics under investigation — not established benefits

Ginseng — ginsenosides

Lingzhi — polysaccharides, triterpenes

Lion’s mane — neurobiology, gut–brain research

Astragalus — polysaccharides, saponins

Goji, jujube — constituents and food applications

INGREDIENTS · 1 OF 2

Ingredient familiarity is not a substitute for product-specific evidence

Traditional ingredients may offer useful starting points, but commercial development requires a clear identity, reliable sourcing, appropriate safety controls and evidence relevant to the proposed use. Composition can vary by species, plant part, growing conditions, harvest, processing and storage. Constituents listed below are subjects of study, not claimed benefits.

Goji

Lycium barbarum

Catalogue · 2002 list ³⁰



Part & constituents studied: Fruit; polysaccharides, carotenoids
Example formats: Drinks, snacks, bakery
Check: Pesticide residues; documented origin

Jujube

Ziziphus jujuba

Catalogue · 2002 list ³⁰



Part & constituents studied: Fruit; sugars, fibre
Example formats: Drinks, snacks, confectionery
Check: Sugar in finished products

Ginger

Zingiber officinale

Catalogue · 2002 list ³⁰



Part & constituents studied: Rhizome; gingerols, shogaols
Example formats: Drinks, teas
Check: Listed as 姜 (fresh and dried); confirm the form used

Poria

Wolfiporia cocos

Catalogue · 2002 list ³⁰



Part & constituents studied: Sclerotium; polysaccharides
Example formats: Cakes, snacks, drinks
Check: Texture; consumer familiarity abroad

Monk fruit

Siraitia grosvenorii

Catalogue · 2002 list ³⁰



Part & constituents studied: Fruit; mogrosides (sweet-tasting)
Example formats: Sweeteners, drinks
Check: Extracts may be regulated as sweeteners/additives

Astragalus

Astragalus membranaceus

Catalogue · 2023 ³



Part & constituents studied: Root; polysaccharides, saponins
Example formats: Teas, soups, drinks
Check: Bitterness; species and root specification

Sources: ³ NHC/SAMR 2023 No. 9 · ³⁰ MoH 卫法监发〔2002〕51号 — full references on pages 37–38.

INGREDIENTS · 2 OF 2

Compare ingredients by identity, evidence, supply and regulatory status

American ginseng

Panax quinquefolius

Catalogue · 2023 ³



Part & constituents studied: Root; ginsenosides
Example formats: Drinks, slices
Check: Plant part; conditions in the notice

Ginseng (cultivated)

Panax ginseng

New food ingredient · 2012 ⁷



Part & constituents studied: Root; ginsenosides
Example formats: Drinks, nutrition products
Check: ≤5 years cultivated; intake and population conditions in the notice

Lingzhi

Ganoderma spp.

Catalogue · 2023 ³



Part & constituents studied: Fruiting body; polysaccharides, triterpenes
Example formats: Drinks, powders
Check: Spore powder not covered by the catalogue^{3,6}

Dendrobium

Dendrobium officinale 铁皮石斛

Catalogue · 2023 ³



Part & constituents studied: Stem; polysaccharides
Example formats: Drinks
Check: Species substitution; authentication

Lion's mane

Hericium erinaceus

Not on the catalogue



Part & constituents studied: Fruiting body; eaten as a culinary mushroom
Example formats: Drinks, bars
Check: Extract status varies by market — verify

FOUR SEPARATE DIMENSIONS

- 1 Exact identity and permitted form
- 2 Composition and batch consistency
- 3 Safety and evidence relevant to the intended use
- 4 Regulatory status in each target market

The best-known ingredient is not necessarily the best commercial choice: supply, cost, formulation performance, consumer acceptance and permitted claims also matter.

THE DEVELOPMENT PATHWAY

A six-step framework for developing evidence-led botanical products

Regulatory strategy should run throughout development, not be left until the product is finished. Steps 2 and 5 are marked because that is where regulatory questions are most often decided — but every step has a compliance dimension.

Common development challenges

Variable composition	Chemical complexity	Compound interactions
Bioavailability	Bitter or earthy notes	Colour and aroma
Solubility	Processing stability	Shelf-life stability
Batch consistency	Supply-chain authenticity	Regulatory classification

EXAMPLE: A STRUCTURED RESEARCH PROGRAMME

Under a memorandum signed on 14 November 2024, Infinitus (China) agreed with Hong Kong Baptist University to fund a joint laboratory on herbal polysaccharide research, over three years with a possible two-year extension, according to HKBU’s announcement.²⁴

- 1

Define the need
Consumer need, product format and target market.
- 2

Screen the ingredient · REGULATORY
Identity, safety, evidence, regulatory status and supply reliability.
- 3

Formulate and test
Taste, solubility, stability and manufacturing feasibility.
- 4

Plan the evidence
Proportionate to the intended use and claim.
- 5

Confirm the regulatory route · REGULATORY
Product classification, pathway and claims in every target market.
- 6

Prepare to launch
Manufacturing, quality, labelling, intellectual property and commercialisation plans.

PART V · BUSINESS & ENTRY

Assessing commercial opportunities across the value chain

Potential business models include compliance and testing services, standardised ingredient supply, contract manufacturing, differentiated consumer brands, health foods and specialist research services. Each has a different combination of capital requirements, technical complexity, regulatory exposure, customer-acquisition needs and time to revenue.

The opportunity map is an editorial assessment, not a measured investment ranking. It should be

used to frame diligence questions rather than as evidence that a particular model will outperform.

How to read it. The horizontal axis combines the capital, technical capability and regulatory requirements needed to enter. The vertical axis is the editors’ qualitative view of commercial potential, considering demand signals, ability to differentiate and exposure to tightening rules. Positions are indicative and depend on each company’s capabilities, market and execution.

The opportunity map

FOODMED qualitative assessment; not investment advice



Positioning is indicative and depends on capabilities, market and execution.

NINE BUSINESS MODELS COMPARED

Compare business models by capability, capital and route to revenue

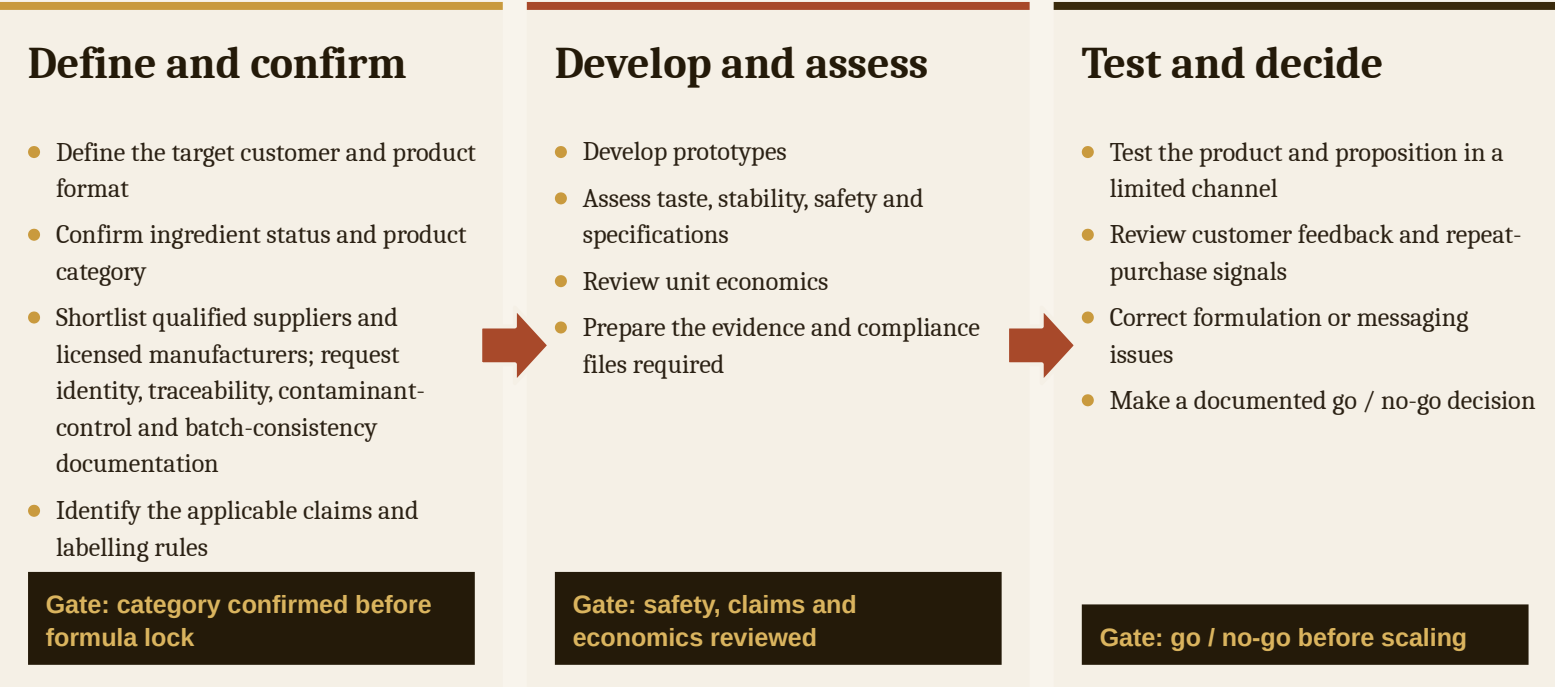
Business models differ in the capabilities they require and the risks they carry. Contract manufacturing can generate processing and formulation fees; ingredient suppliers may earn through specified grades and supply relationships; testing and regulatory services depend on technical credibility; brands depend on product-market fit, distribution and repeat purchase. The best entry route is the one that matches the entrant’s assets and customer access — not necessarily the model with the largest headline market.

BUSINESS MODEL	WHAT IT IS	POTENTIAL REVENUE MODEL	BARRIER (CAPITAL / TECHNICAL)	EDITORS' NOTE
Contract manufacturing (OEM/ODM)	Formats and production for brands	Processing and formulation fees	High / Medium	Serves many brands; requires licences and quality systems
Standardised ingredient supply	Specified ingredients with defined markers	Specified grades; supply relationships	Medium / High	Value depends on specification quality and consistency
Compliance, testing & regulatory services	Filing, registration, label and claims review, testing	Fees and retainers	Low / High	Depends on technical credibility
Specialist research services	Characterisation, mechanism and human studies	Research contracts; licensing	Medium / High	Long cycles; needs qualified partners
Upstream cultivation & traceability	Sourcing, aggregation, traceability systems	Raw-material sales; possible origin premium	Medium / Low	Exposed to harvest and price cycles
Differentiated consumer brands	Drinks, snacks, tonics, pet nutrition	Product sales; repeat purchase	Medium / Low (marketing high)	Depends on product-market fit and distribution
Channels & retail	E-commerce, instant retail, private domain	Channel margin	Low / Low	Online-sales rules apply
Foodservice	Herbal tea and coffee menus; soup bases	Menu margin	Medium / Medium	Food-safety and claims rules still apply
Health food	Products using the health-food framework	Product sales with permitted claims	High / High	Evidence, time and regulatory investment required

Scoring basis. Barrier ratings (low / medium / high) are the editors' qualitative judgement of typical starting capital and technical capability for a new entrant in mainland China; they are not measured values. Editors' notes identify the main dependency for each model, not a forecast of returns.

THE ENTRY PLAYBOOK

A practical plan for a first product



INDICATIVE ONLY

This plan assumes a relatively simple ordinary-food product. Health foods, novel ingredients, medicines or cross-border products may require additional steps and more time. It is not a timetable or a regulatory approval schedule.

SELLING INTO CHINA FROM ABROAD

Overseas producers of imported food must register with China Customs under GACC Decree 248.¹⁷

“Confirm the category before you lock the formula.”

Sources: ¹⁷ GACC Decree 248 — full references on pages 37–38.

BEFORE YOU COMMIT

For international companies

- 1 **What is available?** Which ingredients have established food use, documented supply and a confirmed legal status for your intended use?
- 2 **What can R&D add?** Where would characterisation, formulation or clinical work change what you can sell or say?
- 3 **Will it travel?** What evidence and regulatory strategy does each target market require?

For Chinese companies going abroad

- 1 **Can it be standardised?** Can you specify and reproduce what buyers will receive, batch after batch?
- 2 **What can be substantiated?** Which claim, in which market, does your evidence support?
- 3 **Is the pathway defined?** Has classification been confirmed for the ingredient, form, dose, use and claims?
- 4 **Does the product fit the market?** Have taste, format, dose, pack and wording been tested with target consumers?
- 5 **Are IP and results protected?** Are ownership of data, inventions and trademarks agreed before work starts?

RISK REGISTER

Seven common market-entry risks — and how to mitigate them

1. Unsubstantiated claims

Mitigation: Approve wording for every channel and partner.

2. Incorrect ingredient identity or status

Mitigation: Verify species, plant part, form and legal route.

3. Inconsistent composition

Mitigation: Establish specifications and batch-release controls.

4. Weak product-market fit

Mitigation: Test taste, convenience, price and repeat purchase.

5. Fragile supply

Mitigation: Assess origin, traceability, seasonality and supplier qualification.

6. Inadequate market-specific compliance

Mitigation: Review destination-market rules before investment.

7. Unsupported commercial assumptions

Mitigation: Validate addressable demand, margins, acquisition costs and channel economics.

INVESTMENT

Assess growth with evidence, not headline narratives

Revenue growth among selected listed companies can provide context on adjacent sectors, but it does not directly measure the food-medicine homology market. Company results may reflect acquisitions, price changes, product mix, overseas sales or business lines unrelated to the category.

Investors should distinguish reported revenue growth from organic growth, total company performance from segment performance, and category exposure from actual category revenue. Investment attractiveness also depends on margins, cash generation, valuation, capital intensity and regulatory risk.

Company figures should be taken from audited annual reports or exchange filings, for a consistent financial year, and labelled as whole-company or segment results.

DILIGENCE QUESTIONS FOR ANY OPPORTUNITY

- 1

Can the ingredient be defined and reproduced?
- 2

Does the evidence match the product, dose, population and permitted claim?
- 3

Can production scale with consistent quality?
- 4

Has the regulatory route been confirmed?
- 5

Is there a route to each target market?

What a growth figure does — and does not — tell you

Common confusions in sector investment narratives

A FIGURE FOR...	...IS NOT	WHY IT MATTERS
Reported revenue growth	≠ Organic growth	Acquisitions, price changes and product mix can move reported figures
Total company performance	≠ Segment performance	Business lines unrelated to the category may dominate
Category exposure	≠ Actual category revenue	Few companies report food-medicine homology sales separately
Revenue	≠ Margins and cash generation	Growth without margin or cash can destroy value
Market attractiveness	≠ Valuation, capital intensity, regulatory risk	The price paid and the rules matter as much as demand

“Do not use total company revenue as a proxy for food-medicine homology sales.”

PART VI · HONG KONG & HKBU

Hong Kong as a bridge between Chinese capabilities and international networks

Hong Kong may support collaboration between mainland Chinese ingredient and product capabilities and international research, testing, investment and market networks. Its practical role depends on the specific partners, facilities, regulatory requirements and commercial objectives involved; location alone does not ensure international acceptance or any regulatory advantage.

On 18 December 2025 the HKSAR Government released its Chinese Medicine Development Blueprint, with goals that include enhancing the quality and standards of Chinese medicines, contributing to international standards and supporting the sector to “go global.” The Chinese Medicine Hospital of Hong Kong and the permanent premises of the Government Chinese Medicines Testing Institute began services on 11 December 2025.¹⁸

BEFORE ANY COLLABORATION, DEFINE

- 1

The project question and the decision it supports
- 2

Evidence needs and methods
- 3

Ownership of results and intellectual property
- 4

The regulatory target in each market
- 5

The route to commercialisation



Hong Kong Science Park, venue of FOODMED 2026.²⁶



Sources: ¹⁸ HKSAR Govt, 18 Dec 2025 · ²⁶ FOODMED 2026 programme — full references on pages 37–38.



Artwork: FOODMED.

POSSIBLE AREAS OF COLLABORATION

- Ingredient characterisation
- Analytical methods
- Mechanism research
- Formulation
- Evidence development
- IP & translation

HKBU RESEARCH & TRANSLATION

Translating traditional knowledge into structured research programmes

Hong Kong Baptist University’s research platforms can be relevant to ingredient characterisation, analytical methods, mechanism research, formulation and evidence development. A collaboration should begin with a defined question, appropriate methods, clear responsibilities and an agreed plan for data, intellectual property and potential translation.

Research milestones should be described precisely. In July 2023 HKBU announced that CDD-2101, a botanical drug candidate it developed for chronic constipation, had been authorised by the US FDA to conduct a Phase I clinical trial assessing safety, tolerability and pharmacokinetics in healthy individuals

— the first such authorisation for a new botanical drug developed in Hong Kong.²¹ In January 2024 HKBU announced that CDD-2107, for BAG3-related myofibrillar myopathy, had received FDA orphan drug designation.²²

Authorisation to begin a clinical trial and orphan designation are regulatory milestones; they are not proof of efficacy or approval to market a product.

In April 2024 HKBU announced a HK\$230 million donation from the Wu Jieh Yee Charitable Foundation to advance translational Chinese medicine research through the Wu Jieh Yee Institute.²³

RESEARCH AND TRANSLATION PLATFORMS

- Wu Jieh Yee Institute of Translational Chinese Medicine Research
- School of Chinese Medicine
- Faculty of Science — including data science and food science
- Centre for Chinese Herbal Medicine Drug Development
- Institute for Innovation and Translation; Knowledge Transfer Office
- Food Safety Consortium

COMPANY REPORTED

HK\$230m donation announced April 2024²³

2023 FDA authorisation for a Phase I trial of CDD-2101²¹

Sources: ²¹ HKBU, 25 Jul 2023 · ²² HKBU, 31 Jan 2024 · ²³ HKBU, 26 Apr 2024 — full references on pages 37–38.

PART VII · FOODMED 2026

Bring a product question. Leave with a clearer plan.

FOODMED 2026, the second FoodMed Conference, takes place on **5–6 November 2026 at Hong Kong Science Park.**²⁶ The programme brings together regulatory, scientific, industry and investment perspectives on food-medicine homology and related innovation.

Day 1 focuses on regulatory systems, safety, quality and evidence. Day 2 focuses on translation, entrepreneurship, investment and future directions in food as medicine.

FoodMed 2024 had about 300 participants; it received the International Association for Food Protection’s 2025 Best Overall Affiliate Meeting Award, presented to the Food Safety Consortium, which co-organised the conference with HKBU.²⁵

Bring a product or ingredient dossier, target-market questions and a clear view of the decision you need to make.

DAY 1 · 5 NOVEMBER

Regulation, safety, quality and evidence

Opening, remarks and keynotes

Regulatory systems

Safety and quality

Innovation, validation and evidence

Networking reception

DAY 2 · 6 NOVEMBER

Translation, investment and entrepreneurship

Translational Chinese medicine and food homology

Industry and investment

Start-up pitching

The future of food as medicine

Close of conference

Programme subject to change: foodmed.hk/en/programme/programme-details/

REGISTER



Scan to register
FOODMED 2026
registration

go.adobe.io/r/eDXBHb0WNe9

ONE-TO-ONE MEETINGS

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Food Safety Consortium

www.fschk.org/en/index/home

GLOSSARY

Key terms for regulatory and commercial discussions

Food-medicine homology 药食同源

A Chinese concept concerning substances traditionally used as both food and Chinese medicinal material; commercial food use depends on applicable law.

Food-medicine substance catalogue 食药物质目录

The official catalogue identifying substances that may be used as food under specified conditions.

New food ingredient 新食品原料

A separately regulated approval route; conditions in the approval notice apply.

Health food 保健食品

A regulated product category subject to applicable registration or filing requirements and permitted claims.

Registration / filing 注册 / 备案

Distinct health-food regulatory pathways; eligibility depends on the applicable rules.

Health-food raw-material catalogue 保健食品原料目录

The list of ingredients usable in health food under the filing framework, within stated conditions.

Permitted-function catalogue

The health functions a health food may claim; updated by official announcement.

Dietary-guidance guideline 食养指南

NHC guidance on eating patterns; not an authorisation for product claims.

Marker compound

A measured constituent used as one element of ingredient characterisation or quality control; it does not alone establish efficacy.

SC licence

China’s food production licence, issued by local market regulators.

GB 7718-2025

China’s national food-safety standard for labelling prepackaged foods; implemented from 16 March 2027.

FSMP 特医食品

Food for special medical purposes — a distinct regulated category in China.

GRAS (United States)

“Generally recognised as safe” status for food substances; a 2026 proposal would make notification to FDA mandatory — a proposal, not law.

NDI (United States)

New dietary ingredient notification for certain ingredients in dietary supplements.

Novel food (European Union)

A food requiring authorisation under Regulation (EU) 2015/2283, broadly one without a significant history of consumption in the EU before 15 May 1997; see the Regulation for the legal definition.

GACC Decree 248

China Customs regulations on registration of overseas producers of imported food.

CBEC

Cross-border e-commerce import channel into China, subject to its own rules.

Abbreviations

NHC National Health Commission · SAMR State Administration for Market Regulation · NATCM National Administration of Traditional Chinese Medicine · CFSA China National Center for Food Safety Risk Assessment · NMPA National Medical Products Administration · GACC General Administration of Customs · MARA Ministry of Agriculture and Rural Affairs · MIIT Ministry of Industry and Information Technology · MCA Ministry of Civil Affairs

SOURCES, DEFINITIONS AND LIMITATIONS · 1 OF 2

Numbered reference register

Grouped by source type and listed in number order within each group. All URLs accessed October 2026.

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DEFINITIONS AND LIMITATIONS

Market-size figures are third-party estimates, not official statistics, unless explicitly identified otherwise. Definitions differ across sources. Company figures represent whole-company or specified segment results as labelled and should not be interpreted as food-medicine homology sales unless the source reports that category separately.

Every figure in this publication is cited with its source. Figures whose original method or dataset could not be accessed have been removed rather than labelled. Where a primary document is cited through a secondary report, the report is listed under “Secondary and media reports”.

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药食同源

Understanding food-medicine homology is only the starting point. The opportunity lies in turning traditional knowledge into products that meet the requirements of science, regulation and the market.

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