

**KARADENİZ İHRACATÇI BİRLİKLERİ
GENEL SEKRETERLİĞİ**



Sayı : 35649853-TİM.KİB.GSK.UYG.2025/1667-3874

Giresun, 12/12/2025

Konu : Çin Halk Cumhuriyeti İle İmzalanan Badem Protokolü

E-POSTA

**KARADENİZ İHRACATÇI BİRLİKLERİ ÜYELERİNE SİRKÜLER
2025/712**

Sayın üyemiz,

Tarım ve Orman Bakanlığının bir yazısına atfen, T.C. Ticaret Bakanlığı İhracat Genel Müdürlüğünden alınan 11/12/2025 tarih 116469474 sayılı yazıda;

Ülkemizden Çin Halk Cumhuriyeti (ÇHC)'ne badem ihracatı kapsamında, iki ülke arasında hazırlanan "**Türkiye'den Çin'e İhraç Edilen Bademlerin İnceleme ve Karantina Gerekliklerine İlişkin Protokol**"ün 15 Ekim 2025 tarihinde imzalandığı, anılan protokolde belirtilen şartların yerine getirilmesi koşuluyla ÇHC'ye badem ihracatının önünün açıldığı belirtilmektedir.

Bu kapsamda, Çin'e badem ihracatı için gerekli teknik hükümleri içeren protokolde belirtilen "işletme kaydı" hususunun Çin Halk Cumhuriyeti Gümrükler Genel İdaresi (GACC) tarafından yüksek riskli ürün grupları için talep edilen kayıt prosedürüne göre yapılmasının gerektiği ve ayrıca, firmaların ekte yer alan denetim formu ve excel dosyasını hazırlayarak bağlı bulundukları ilin İl Tarım ve Orman Müdürlüğü ya da Ziraî Karantina Müdürlüğü'ne başvuruda bulunmalarının gerektiği ifade edilmektedir.

Bilgilerinize sunarız.

e-imzalıdır
Salih AKSOY
Genel Sekreter V.

EKLER:

Ek-I: GACC Sistem Kayıt Formu

Ek-II: GACC Denetim Formu

Karadeniz İhracatçı Birlikleri Genel Sekreterliği
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Ayrıntılı bilgi için: Vedat İYİĞÜN - İdari Personel

Appendix 2-6

Conditions for Registration of Overseas Production Enterprises of Imported Nuts and Seeds Food and Key Points of Conformity Inspection

Registration No.:

Enterprise Name:

Address:

Date of Filling:

Notes:

1. According to the Provisions of the People's Republic of China on the Administration of Registration of Overseas Production Enterprises of Imported Food (Decree No. 248 of the General Administration of Customs), an overseas production enterprise of nuts and seeds food applying for registration in China shall establish the effective food safety and hygiene management and protection system and ensure that the food exported to China complies with the relevant laws and regulations of China and the national food safety standards, as well as the relevant inspection and quarantine requirements agreed upon by the General Administration of Customs and the competent authority of the country (region) where it is located. Overseas competent officials of imported nuts and seeds food may conduct official inspection on

production enterprises of nuts and seeds food according to the main conditions and bases and key points of review set forth in this form. At the same time, overseas production enterprises of nuts and seeds food may fill in and submit supporting materials according to the main conditions and bases set forth in this form, and conduct self-inspection and self-evaluation according to key points of review set forth in this form before applying for registration.

2. Overseas competent authorities and overseas production enterprises of nuts and seeds food must make a truthful judgment of conformity according to the actual situation of the conformity inspection.

3. The submitted materials shall be truly and completely filled out in Chinese or English. The appendixes shall be numbered, and their numbers and contents shall accurately correspond to the item numbers and contents in the column of "Filling Requirements and Supporting Materials". The list of appendixes of supporting materials shall be provided.

Nuts refer to the kernels of woody plants with hard shells, including walnuts, chestnuts, apricots, almond cores, pecans, pistachios, Torreya, Hawaiian nuts, and pine seeds. Seeds refer to the kernels of plants such as melon, fruit, and vegetables, including watermelon seeds and pumpkin seeds. Nuts and seeds food is processed with nuts, seeds, or their kernels as the main raw materials.

Item	Conditions and Bases	Filling Requirements and Supporting Materials	Key Points of Review	Conformity Determination	Remarks
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1. Enterprise Overview

1.1 Enterprise overview	<p>1. Articles 5, 6, 7, and 8 of the Provisions of the People's Republic of China on the Administration of Registration of Overseas Production Enterprises of Imported Food (Decree No. 248 of the General Administration of Customs).</p> <p>2. Protocol on Inspection and Quarantine of Nuts and Seeds Food to Be Exported to China signed between the competent authority of the applicant country and the General Administration of Customs.</p>	<p>1.1.1 Fill out the form of basic information of overseas production enterprises of imported nuts and seeds food.</p> <p>1.1.2 Provide the production and operation information in the past 2 years from the date of review (or information since the establishment of the enterprise if it has been established for less than 2 years), including the production capacity, annual actual output (by variety), and export volume (if any, by variety and country).</p>	<p>1. The enterprise shall truthfully fill in the information. The basic information shall be consistent with that submitted by the competent authority of the exporting country and with the actual production and processing.</p> <p>2. The nuts and seeds food to be exported to China shall conform to the product scope stipulated in relevant agreements, protocols, and memorandums on inspection and quarantine of the nuts and seeds food to be exported to China.</p>	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
1.2 Management system	<p>1. Articles 5, 6, 7, and 8 of the Provisions of the People's Republic of China on the Administration of Registration of Overseas Production Enterprises of Imported Food (Decree</p>	<p>1.2 Provide management system documents in terms of phytosanitary prevention and control, food safety management, personnel management, chemical use, raw material acceptance, storage management, finished product export inspection, recall of</p>	<p>The enterprise shall establish and effectively implement management system documents covering but not limited to the phytosanitary prevention and control, food safety management, personnel management, chemical use, raw material acceptance, storage</p>	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	

	<p>No. 248 of the General Administration of Customs).</p> <p>2. Protocol on Inspection and Quarantine of Nuts and Seeds Food to Be Exported to China signed between the competent authority of the applicant country and the General Administration of Customs.</p>	unqualified products, and traceability management.	management, finished product export inspection, recall of unqualified products, and traceability management.		
1.3 Management organization	<p>1. Articles 5, 6, 7, and 8 of the Provisions of the People's Republic of China on the Administration of Registration of Overseas Production Enterprises of Imported Food (Decree No. 248 of the General Administration of Customs).</p> <p>2. Protocol on Inspection and Quarantine of Nuts and Seeds Food to Be Exported to China signed between the competent authority of the applicant</p>	1.3 Provide the information on the manning of the enterprise's management organization and the department or post related to plant health and food safety management.	The enterprise shall set up a department or post responsible for the management of plant health and food safety, and allocate management personnel with the background of professions related to plant health and food safety.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	

	country and the General Administration of Customs.				
2. Enterprise Location and Workshop Layout					
2.1 Site selection and plant environment	1. Articles 3.1 and 3.2 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	2.1.1 Provide a plant plan, indicating the names of different operation areas. 2.1.2 Provide pictures of the environment of the area where the plant is located, indicating the ambient information (urban, suburban, industrial, agricultural, and residential areas).	1. The plant layout meets the needs of production and processing. 2. There is no pollution source around the plant.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
2.2 Workshop layout	1. Article 4.1 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	2.2 Provide a workshop plan, indicating people flow, material flow, water flow, processing flow, and different cleaning areas.	1. The workshop shall be adapted to the production capacity and the arrangement of the equipment in terms of its area and height, conform to the technological process and safety and hygiene requirements of the processed products, and prevent cross contamination. 2. Openable doors and windows in the workshop and access to the outside shall be provided with facilities for preventing insects, rats, birds, bats and other flying animals.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
3. Facility and Equipment					

3.1 Production and processing equipment	1. Article 5.2.1 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	3.1 Provide a list of main equipment and facilities and designed processing capacity.	1. The enterprise shall be equipped with production equipment suitable for the production and processing capacity.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
3.2 Storage facility	1. Article 10 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	3.2 Please describe the temperature control requirements and monitoring methods if there is a cold storage. (If applicable)	1. Storage facilities can meet the basic requirements for product storage as well as the requirements for preventing insects, temperature control, and humidity control.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
4. Water/Ice/Steam					
4.1 Water/ice/steam for production and processing (if applicable)	1. National Food Safety Standards - Standards for Drinking Water Quality (GB 5749). 2. Article 5.1.1 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	4.1.1 Provide photos of self-provided water sources or secondary water supply facilities and explain whether there are food protection measures such as assigning specific persons for management and locking. (if applicable) 4.1.2 Provide a monitoring plan for water used in production and processing and ice/steam (where applicable) in direct contact with food, including bacteriological inspection items, methods, frequency, records, and inspection	1. The monitoring plan for water used in production shall cover all water outlets in the plant. 2. Whether the items and methods conform to the requirements of the National Food Safety Standards - Standards for Drinking Water Quality (GB 5749). 3. Hygiene control procedures shall be formulated and implemented for the water supply facilities, and appropriate food protection measures shall be in place. 4. Boiler additives used in the production of steam in direct contact	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming <input type="checkbox"/> NA	

		results. 4.1.3 Provide boiler additives used in the production of steam in direct contact with food and explain whether they meet the requirements of food production and processing.	with food shall meet the requirements of food production and processing.		
5. Raw and Auxiliary Materials and Packaging Materials					
5.1 Acceptance and control of raw and auxiliary materials	1. Article 7 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	5.1 Provide acceptance measures for raw materials and additives, including acceptance standards and methods.	1. Acceptance standards for raw materials and additives, and their compliance with the requirements of Chinese laws and standards. 2. Before the raw materials are allowed to enter the plant, the enterprise shall check the plant quarantine and plant safety of the raw materials, or take necessary pest control measures to ensure that the raw materials meet the requirements of work safety, and establish the records of acceptance and pest control, which shall be kept for no less than 2 years.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
5.2 Source of raw materials	1. National Food Safety Standards - Limit of Pathogens in Foods (GB 29921). 2. National Food Safety Standards - Standards for the Use of Food Additives	5.2.1 Provide the latest test report on the products conforming to China's national food safety standards. (If applicable) 5.2.2 Provide materials to prove that the raw materials for the enterprise's production shall come from any	1. The raw materials used shall meet the requirements stipulated in Chinese laws and regulations, national food safety standards, relevant agreements, protocols, and memorandums on inspection and quarantine of the nuts and seeds	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	

	(GB 2760). 3. National Food Safety Standards - Limit of Mycotoxins in Foods (GB 2761). 4. National Food Safety Standards - Limit of Contaminants in Foods (GB 2762). 5. National Food Safety Standards - Maximum Residue Limits for Pesticides in Food (GB 2763). 6. National Food Safety Standards - Nuts and Seeds Food (GB 19300).	area without the reporting of quarantine pests under close supervision of the Chinese government, and raw material suppliers shall have the qualification required by the local regulations.	food exported to China, and other provisions. 2. Whether the enterprise has established raw material conformity assessment and implemented traceability management for the purchased raw materials in accordance with the requirements of the protocol.		
5.3 Food additives (if applicable)	1. Article 7.3 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881). 2. National Food Safety Standards - Standards for the Use of Food Additives (GB 2760).	5.3 List of food additives used in production and processing (including the name, purpose and added amount).	1. The food additives used in the production conform to China's regulations on the use of food additives.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming <input type="checkbox"/> NA	
5.4 Packaging materials	1. Article 8.5 of the National Food Safety	5.4.1 Provide the proof that the inner and outer packaging materials	1. Packaging materials shall not affect food safety and product	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	

	Standards - General Hygienic Specifications for Food Production (GB 14881). 2. Relevant bilateral agreements, memorandums and protocols on inspection and quarantine.	are suitable for product packaging. 5.4.2 Provide label styles for finished products to be exported to China.	characteristics under specific storage and use conditions. 2. Packaging labels shall meet the requirements of bilateral agreements, memorandums, and protocols on inspection and quarantine.		
6. Production and Processing Control					
6.1 Establishment and operation of food safety and hygiene control system	1. National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881). 2. Hazard Analysis and Critical Control Point (HACCP) System - General Requirements for Food Processing Plant (GB/T 27341).	6.1.1 Provide the process flow of production and processing, indicating the critical control points (CCP) and the hazard control measures taken. 6.1.2 If the HACCP system is adopted, provide the hazard analysis worksheet, the HACCP schedule, and sample sheets of CCP monitoring records, deviation correction records, and verification records (if applicable).	1. The process flow of production and processing and corresponding major process parameters of the enterprise shall be scientific and standardized and able to ensure product safety. Moreover, special hazard control measures shall be taken, or critical control points (CCP) shall be set, for any and all crucial processes with safety risks.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming <input type="checkbox"/> NA	
6.2 Mycotoxins control	1. National Food Safety Standards - Limit of Mycotoxins in Foods (GB 2761).	6.2 Provide the sampling inspection report that the mycotoxins in the products produced, processed, and stored meet the national food safety standards of China.	1. Whether the control system of mycotoxins in the products produced, processed, and stored is reasonable in the processing plant. 2. The test results shall conform to China's national food safety	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	

			standards.		
6.3 Use of food additives and nutritional fortification substances (if applicable)	1. Article 7.3 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881). 2. National Food Safety Standards - Standards for the Use of Food Additives (GB 2760). 3. National Food Safety Standards - Standards for the Use of Nutritional Fortification Substances in Foods (GB 14880).	6.3 Provide the production and processing process, product monitoring plan, and monitoring results.	1. The test results shall conform to China's national food safety standards.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming <input type="checkbox"/> NA	
7. Cleaning and Disinfection					
7.1 Cleaning and disinfection	1. Article 8.2.1 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	7.1 Provide cleaning and disinfection measures, including cleaning and disinfection methods and frequency, and verification of cleaning and disinfection effects.	1. Cleaning and disinfection measures shall be able to eliminate cross contamination and meet hygiene requirements.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
8. Control of Chemicals, Waste and Insects and Rats					
8.1 Control of chemicals	1. Article 8.3 of the National Food Safety Standards - General	8.1 Briefly describe the chemical use and storage requirements.	1. The chemical management system is reasonable and can effectively prevent the chemicals	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming <input type="checkbox"/> NA	

	Hygienic Specifications for Food Production (GB 14881).		used from contaminating the products.		
8.2 Management of physical pollution	1. Article 8.4 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	8.2 Provide the management system to prevent physical pollution and relevant treatment records.	1. A management system for preventing pollution caused by foreign matters shall be established; possible pollution sources and pollution routes shall be analyzed and corresponding control plans and control procedures shall be developed. 2. Measures such as equipment maintenance, hygiene management, on-site management, external personnel management, and processing supervision shall be taken to the greatest extent to reduce the risk of food contamination by foreign matters such as glass, metal, and plastic. 3. Effective measures such as setting screens, collectors, magnets, and metal detectors shall be taken to reduce the risk of food contamination by metals or other foreign matters.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
8.3 Control of insects and rats	1. Article 6.4 of the National Food Safety Standards - General	8.3 Provide control methods and layout plans for insects. If the control is undertaken by a third	1. The impact of insects and rats such as mosquitoes and flies on production safety and health shall be	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	

	Hygienic Specifications for Food Production (GB 14881).	party, provide the qualification of the third party.	avoided.		
8.4 Waste management	1. Article 6.5 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	8.4 Provide the waste management system and relevant disposal records.	1. Edible product containers and waste storage containers in the workshop shall be clearly marked and distinguished. 2. Waste shall be stored separately and disposed of in time to avoid pollution to production.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
9. Product Traceability					
9.1 Traceability and recall	1. Article 11 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	9.1 Describe the product traceability procedure in a brief manner and take the batch number of a batch of finished products as an example to illustrate how to trace raw materials from finished products.	1. Traceability procedures shall be established to realize the two-way traceability of the whole chain from raw materials, production and processing processes to finished products.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
9.2 Warehouse-in and warehouse-out management	1. Articles 11 and 14.1 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	9.2 Provide warehouse-in and warehouse-out management of products.	1. Products shall be inspected before entering the warehouse, and the records of warehouse-in inspection, storage, and warehouse-out shall be made and kept for at least 2 years.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
10. Personnel Management and Training					
10.1 Health and hygiene	1. Article 6.3 of the National Food Safety	10.1 Provide pre-employment health management and physical	1. Employees shall accept a physical examination and prove that they are	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	

management of personnel	Standards - General Hygienic Specifications for Food Production (GB 14881).	examination requirements for employees.	suitable for working in food processing enterprises before employment. 2. Employees shall accept regular physical examinations and keep records.		
10.2 Personnel training	1. Article 12 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	10.2 Provide annual training plans, contents, assessments and records for employees.	1. The training shall cover the contents of memorandums, agreements and protocols on inspection and quarantine of the nuts and seeds food exported to China, and Chinese regulations and standards.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
10.3 Requirements for management personnel	1. Article 13.3 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).	10.3 Provide the training records of management personnel on the relevant provisions of the laws and regulations on plant health and food safety of the country/region where the exported products are located and China and conduct on-site sampling inspection and Q&A when necessary.	1. The production and management personnel of the enterprise shall have the business competence adapted to the post requirements, and be familiar with the relevant provisions of laws and regulations on plant health and food safety in the country/region where it is located and China, and the requirements of the protocol on the nuts and seeds food exported to China concluded by the parties and the Specifications. 2. Management personnel shall have qualifications and capabilities suitable for their work.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	

11. Self-inspection and Self-control					
11. Finished product inspection	<p>1. Article 9 of the National Food Safety Standards - General Hygienic Specifications for Food Production (GB 14881).</p> <p>2. National Food Safety Standards - Nuts and Seeds Food (GB 19300).</p> <p>3. National Food Safety Standards - Standards for the Use of Food Additives (GB 2760).</p> <p>4. National Food Safety Standards - Limit of Mycotoxins in Foods (GB 2761).</p> <p>5. National Food Safety Standards - Limit of Contaminants in Foods (GB 2762).</p> <p>6. National Food Safety Standards - Maximum Residue Limits for Pesticides in Food (GB 2763).</p>	<p>11.1 Provide items, indicators, methods and frequency of finished product inspection.</p> <p>11.2 If the enterprise has its own laboratory, submit the laboratory capability and qualification certificates; if the enterprise entrusts a third-party laboratory, provide the qualification certificates of the entrusted laboratory.</p>	<p>1. The enterprise shall carry out plant quarantine and food safety testing on the products, ensuring that the products meet the requirements of China. The test records shall be kept for no less than 2 years.</p> <p>2. The enterprise shall be capable of conducting plant quarantine and food safety inspection and testing on products or may entrust a qualified institution with such inspection and testing.</p>	<p><input type="checkbox"/> Conforming</p> <p><input type="checkbox"/> Non-conforming</p>	
12. Pest Control					

12.1 Prevention and control of quarantine pests of concern to China	Memorandums, agreements, and protocols on inspection and quarantine of nuts and seeds food exported to China.	12.1 Provide the list of quarantine pests of concern to China and the monitoring system and records.	1. The enterprise shall take effective measures during production and storage to prevent products from being infected by pests, monitor the quarantine pests of concern to China, and keep the monitoring records for at least 2 years.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming <input type="checkbox"/> NA	
12.2 Identification of pests	Memorandums, agreements, and protocols on inspection and quarantine of nuts and seeds food exported to China.	12.2 Provide the records of pests found during production and storage as well as the records of identification made by entrusted professional institutions.	1. The enterprise shall be capable of identifying pests found during production and storage or entrust a professional institution with the identification, and establish work records, which shall be kept for no less than 2 years.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming <input type="checkbox"/> NA	
12.3 Pest prevention and control	Memorandums, agreements, and protocols on inspection and quarantine of nuts and seeds food exported to China.	12.3 Provide the records of implementation of pest prevention and control measures in production and storage areas.	1. The enterprise shall implement pest prevention and control measures in production and storage areas on a regular basis or when necessary, and make records of relevant prevention and control measures, which shall be kept for at least 2 years.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming <input type="checkbox"/> NA	
12.4 Fumigation treatment (if necessary)	Memorandums, agreements, and protocols on inspection and quarantine of nuts and seeds food exported to China.	12.4 Provide the fumigation treatment method as well as the qualification of the fumigation institution and personnel.	1. Fumigation treatment method shall meet the requirements of China, and the institution and personnel conducting fumigation shall have relevant qualifications or conditions.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming <input type="checkbox"/> NA	

13. Statement					
13.1 Statement of enterprise	1. Articles 8 and 9 of the Provisions of the People's Republic of China on the Administration of Registration of Overseas Production Enterprises of Imported Food (Decree No. 248 of the General Administration of Customs).		1. Signature of legal person and company seal are required.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	
13.2 Confirmation by competent authority	1. Articles 8 and 9 of the Provisions of the People's Republic of China on the Administration of Registration of Overseas Production Enterprises on Imported Food (Decree No. 248 of the General Administration of Customs).		1. Signature of related person and seal of competent authority are required.	<input type="checkbox"/> Conforming <input type="checkbox"/> Non-conforming	