B Boreal Trade

PRODUCT REGISTRATION · SAMPLE 01

Fruit spread into the Philippines

Prepared for Kootenay Preserves Ltd., Creston, British Columbia · 21 September 2026

Illustrative worked example, not a client engagement. Kootenay Preserves Ltd. is a fictional company invented to show the shape of this deliverable, and its formulation and importer are invented with it. Every regulatory value below is real: each was read off the primary source listed at the end and carries the date it was read.

What you asked

What it takes to get your fruit spread registered in the Philippines, how long it runs for, and what it costs. The answer has one ordinary part and one that catches Canadian formulations, so the second one is first.

Answer in one line

Check your additive declaration against the Codex list before you file anything. Since 2 July 2026 only food additives listed in the Codex General Standard for Food Additives may be used in processed food in the Philippines. An additive permitted in Canada and absent from that list is a registration problem rather than a labelling one, and no amount of paperwork solves it.

1 · The sequence, and who stands where in it

STEP	WHOSE NAME IT IS IN	NOTE
Licence to Operate	Your Philippine importer	You cannot hold one without a Philippine establishment. Must exist first
Certificate of Product Registration	Your Philippine importer	Filed against their licence. Required before manufacture, importation, sale, offering for sale, distribution or transfer

Administrative Order 2020-0017 sets that sequence: the Licence to Operate first, then the product market authorisation, which for most processed food is a Certificate of Product Registration and for some categories a Certificate of Product Notification.

> THE SINGLE MOST CONSEQUENTIAL COMMERCIAL FACT HERE
>
> Because the registration attaches to a licensed establishment, it is filed by your importer, in their name, against their licence. If the relationship ends, the registration does not travel with you unless you agreed in advance that it would, and a new importer generally means filing again from the beginning. Settle it in the distribution agreement before the first order, not afterwards. Registration ownership is a service of its own on our list, and this is the paragraph that explains why it exists.

The registration cannot outlive the licence

Administrative Order 2024-0016 states it plainly: the validity of a Certificate of Product Registration held by an establishment with a valid Licence to Operate is determined by the FDA and in no case exceeds the validity of that licence. So the registration is not an independent asset with its own clock. An importer whose licence has two years left cannot hold a five-year registration for your product however much either of you would prefer it.

Licence terms under Administrative Order 2024-0015 are long. For micro and small enterprises an initial licence runs three years and a renewal six; for medium and large enterprises an initial licence runs six years and a renewal twelve. A long licence means less churn, and it also means the one your importer holds may have been issued years ago under a different scope. Ask what it covers and when it expires, not merely whether they have one.

2 · The additive gate, in detail

Administrative Order 2026-0011, issued on 2 July 2026, provides that only additives listed in the Codex General Standard for Food Additives may be used in processed food, repealing the 1984 guidelines that preceded it. It adopts the latest Codex standard and its future revisions automatically, with updates posted to the FDA website.

YOUR DECLARATION, CHECKED LINE BY LINE. STATUSES BELOW ARE ILLUSTRATIVE

DECLARED COMPONENT	STATUS	ACTION
Fruit, sugar, water	**Not an additive**	None
Pectin	**On the Codex list**	None
Citric acid	**On the Codex list**	None
Colour, unspecified on your declaration	*Cannot be checked*	Name the specific colour and its INS number. An unnamed colour cannot be cleared
Preservative, unspecified on your declaration	*Cannot be checked*	Same. This is the line most likely to fail

Two of your five lines cannot be checked because the declaration names a function rather than a substance. That is not a criticism of the declaration, which is adequate for Canada; it is the first piece of work. Until those two are named against their INS numbers, nobody can tell you whether this product is registrable, and filing to find out costs a product cycle.

The reformulation runway does not apply to you

The order sets transitory provisions. A product holding a registration that expires within five years of the order taking effect files its compliant initial application after the original expires, and a product with three years or less remaining is granted a maximum of three years on renewal, expressly to allow time for reformulation. That window is aimed at products already on the market. **A Canadian product registering for the first time does not get it and has to comply now.**

3 · What it costs

Fees for the licence and the registration are yearly rates multiplied by the number of years of validity applied for. The fee order works the arithmetic through for a high-risk food product.

Registration fee, high-risk food	PHP 3,500 per year
Three-year registration	PHP 10,500
Legal Research Fund levy	PHP 10 or one per cent of the application fee, whichever is higher
Bank collection and courier	*Outside the schedule*

Your risk tier	*To be confirmed on category determination*

The levy is not an FDA charge and is collected on behalf of the University of the Philippines Law Center. The full food fee table sits in Annex E of the order, distinguishes risk tiers and also covers amendment and reapplication fees. It is published as a scanned table and we have not transcribed figures from it beyond the worked example the order itself sets out in text, so the numbers above are the ones the order states rather than ones we have read off an image.

4 · Document checklist

DOCUMENT	HELD BY	STATUS
Importer's current Licence to Operate, with scope and expiry	Importer	*Requested*
Full ingredient and additive declaration with INS numbers	You	**Incomplete. Blocks everything**
Finished product specification	You	*Requested*
Label artwork, as intended for the Philippine market	You	*Not started. Filed with the application*
Manufacturing process flow	You	*Requested*
Shelf-life substantiation	You, or a laboratory	*Not held*
Written agreement on who owns the registration	Both	**Not in place. Settle before filing**

5 · The order of work we recommend

- **Name the colour and the preservative.** You, this week. Everything else waits behind it and the answer may change the product.
- **Check the completed declaration against the Codex General Standard.** Us, on receipt. Reformulating after a refusal costs a product cycle; reformulating now costs a production trial.
- **Confirm the importer's licence scope and expiry.** Them. It caps your registration term and it is a counterparty risk that has nothing to do with your product.
- **Agree registration ownership in writing.** Both, before filing. Afterwards you are negotiating with someone who already holds it.
- **Assemble and file through the FDA electronic system.** Us with the importer. The filing runs electronically rather than on paper.

Sources

- Administrative Order 2020-0017, Revised Guidelines on the Unified Licensing Requirements and Procedures, Philippine Food and Drug Administration, read 18 September 2026. Licence then registration sequence, and when authorisation is required. https://www.fda.gov.ph/wp-content/uploads/2020/05/Administrative-Order-No.2020-0017.pdf
- Administrative Order 2026-0011, Revised Guidelines on the Adoption of the Codex General Standard for Food Additives and Processing Aids, read 18 September 2026. The additive gate, automatic adoption of revisions, and the transitory provisions. https://www.fda.gov.ph/wp-content/uploads/2026/07/Administrative-Order-2026-0011-1.pdf
- Administrative Order 2024-0016, Implementing Guidelines on the New Schedule of Fees and Charges, read 19 September 2026. Fee arithmetic, the Legal Research Fund levy, and the rule that a registration cannot outlive the licence. https://www.fda.gov.ph/wp-content/uploads/2025/01/Administrative-Order-No.-2024-0016.pdf
- Administrative Order 2024-0015, Rules, Requirements and Procedures in the Application for License to Operate, read 19 September 2026. Licence validity periods.

https://www.fda.gov.ph/wp-content/uploads/2024/11/Administrative-Order-No.2024-0015.pdf

- Annex E, Center for Food Regulation and Research schedule of fees, read 19 September 2026. Published as a scanned table; no figures transcribed from it here.
  https://www.fda.gov.ph/wp-content/uploads/2025/01/ANNEX-E.pdf

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