

수출현안 · 수입제도 모니터링 양식

2018년 12월 12일 / 방콕사무소

구 분(택1)	핵심내용
검역	☐ 축산국(DLD)의 조리된 육류제품의 수입 통제 확대

주요내용 및 시사점 · 대처방안

☐ 주요 내용

- 지난 2018년 7월 10일 태국 농무부(MOAC)산하에 있는 축산국(DLD)에 Determination of Cooked Foods Which Are Processed or Cooked Products and Derived from Animal Carcasses as Defined in Animal Epidemic Act B.E. 2558 (A.D. 2015), B.E. 2561 (A.D. 2018)”.에 대한 장관통보를 하였음.
- 이는 축산국에 죽은 동물로부터 파생된 또는 만들어진 육류제품에 대해 수입 통제를 할 수 있는 권한을 부여하는 것으로 소시지, 살라미, 햄, 베이컨, 훈제 육류 제품, 절인 육류제품, 경화된 육류 제품, 꿀 및 기타 관련 제품, 소금의 절인 달걀 및 달걀노른자가 포함되어 있음. 동 관보는 2018년 9월 9일로부터 효력이 발생함.
- 명시된 가공 조리된 식품은 조리되지 않은 육류 제품과 같은 수입 요구 조건이 필요하며, 아직 시장 접근이 허가되지 않은 제품의 경우, 수출업체는 출하 전에 수입 요청(시장 접근 요청)을 해야 하며, 설문지 작성 및 생산 시설 감사 및 축산국 위원회의 수입 승인 검토가 필요.
- 태국 식약청의(FDA)의 관할권에 속하는 조리된 식품에 대한 수입요건은 유지하며, 추가로 모든 수입업자는 2018년 9월 9일 이후로부터 조리된 식품의 대해서는 수입 시 축산국으로부터 수입허가 및 태국 식약청 측에도 제품 등록을 진행하여야 함.
- 그러나 2018년 9월 9일 이전에 태국 식약청에 등록된 제품에 대한 수입 허가를 받는 절차가 있으며, 축산국 규정에 따르면 다음과 같이 명시되어 있음.
 - 2018년 9월 9일 발효되기 전에 저위험(Low Risk)제품으로 분류되어 이전에 수입 이력이 있는 경우, 식약청에 등록 및 승인된 조리된 식품에는 조리되지 않은 육류 제품과 같은 요구 사항이 적용되지 않음. 그러나 이 제품의 수입자는 생산 과정, 제품 목록, 식약청의 제품 등록 승인 등 관련 지원 서류를 통해 축산국 측으로 수입허가를 받아야 함
 - 고위험(High Risk)제품으로 분류되었지만 2018년 9월 9일 발효되기 전에 수입 이력이 있으며, 식약청에 등록/승인된 조리된 식품에는 저위험(Low Risk)제품과 같이 일시적으로 고려가 되지만, 수입업자는 2018년 12월 30일까지 축산국에 초청장을 보내 수출국에서 생산 시설 감사를 시행해야 함.
 - 수입 이력이 없으며, 식약청에 의해 승인되지 않은 조리된 식품에 대해서는 모든 수입 절차가 요구됨.

☐ 시사점 및 대처방안

- 비 육류 제품, 즉 꿀 및 관련 제품, 가공 달걀 및 난황에 대한 명확한 지침은 없음. 그러나 필요한 경우 수입업자 또는 한국 수출업자는 축산국측으로 연락 후 보다 자세하고 명확한 정보를 확인하기를 추천함.
- 새로운 규정은 조리된 육류 식품 수입에 부정적인 영향을 미칠 것이며, 특히 제품 등록을 위해 식약청에서 승인하지 않은 신제품은 축산국 수입 절차 또한 적용을 받게 됨.
- 태국 내 수입 이력이 없는 육류 식품의 수입 시 식약청 및 축산국 수입 절차를 모두 적용받게 되므로, 사전에 태국의 수입업체와 사전 수입 절차 파악 필요

☐ 발표일자/출처 : 2018년 10월 11일 / GAIN Report

Ministry of Agriculture and Cooperatives' Notification
Re: Determination of Cooked Foods Which Are Processed or Cooked Products and Derived
from Animal Carcasses as Defined in Animal Epidemic Act B.E. 2558 (A.D. 2015)
B.E. 2561 (A.D. 2018)

질병 감시 및 통제를 위해, Animal Epidemic Act에 정의된 동물 도체에서 가공되거나 조리된 식품의 수입과 수출 또는 운송을 통제하기 위해서 Animal Epidemic Act의 섹션 4 및 섹션 5에 따라 "도체"의 정의를 제공하기 위해 이 규정에 따라 부여된 권한으로 농무부 장관은 다음과 같이 발표합니다.

1. 이 통지는 고지가 공식적으로 공보에 게재된 후 60일 후에 발효됩니다.
2. 이 통지서에;
"조리된 음식"이란 섭취하기 전에 추가로 가공해야 하는 음식을 포함하여 바로 먹을 수 있는 음식을 의미합니다.
3. 도체에서 파생된 것으로 가공되거나 조리된 식품으로써, 다음의 조리된 식품은 태국 농무부에게 규제 권한을 허용하고 있는 Animal Epidemic Act B.E 2558에 명시된 섹션 4 및 섹션 5에 따른 수입, 수출 및 운송에 대한 규정의 적용을 받습니다.
 - 1) 소시지
 - 2) 중국산 소시지
 - 3) 발효된 돼지고기 소시지(Sour Port Sausage)
 - 4) 살라미
 - 5) 햄
 - 6) 베이컨
 - 7) 훈제육류제품
 - a) 훈제소고기
 - b) 훈제돼지고기
 - c) 훈제 양고기 고기
 - d) 훈제 염소고기
 - e) 훈제 닭고기
 - f) 훈제 오리고기
 - g) 훈제 거위고기
 - h) 훈제 칠면조고기
 - i) 훈제 타조고기
 - 8) 절인 고기제품(pickled meat products)
 - a) 절인 소고기
 - b) 절인 돼지고기
 - c) 절인 양고기 고기
 - d) 절인 염소고기
 - e) 절인 닭고기
 - f) 절인 오리고기

- g) 절인 거위고기
- h) 절인 칠면조고기
- l) 절인 타조고기

9) 절인 육류 제품(cured meat products)

- a) 절인 소고기
- b) 절인 돼지고기
- c) 절인 양고기 고기
- d) 절인 염소고기
- e) 절인 닭고기
- f) 절인 오리고기
- g) 절인 거위고기
- h) 절인 칠면조고기
- l) 절인 타조고기

10) 육가공 버거(meat product burger)

- a) 소고기 햄버거
- b) 돼지고기 햄버거
- c) 양고기 고기 햄버거
- d) 염소고기 버거
- e) 닭고기 버거
- f) 오리고기 버거
- g) 거위고기 버거
- h) 칠면조고기 버거
- l) 타조고기 버거

11) 꿀

12) 벌집

13) 로열 젤리

14) 소금의 절인 달걀 및 달걀노른자

15) 삭힌 달걀

2018년 6월 13일 공고 완료

Mr. Luck Wajananawat

Deputy Minister of Agriculture and Cooperatives,

태국 농무부 공고문 관련 수입 가이드라인

절차

■ 수입 위험도의 따른 제품 분류(OIE 원칙)

1. 저위험(Low Risk)

- a. 조리 : 음식의 모든 부분을 최소 30분 동안 섭씨 70도 이상으로 가열
- b. 소금으로 절여지고 최소 313일 동안 건조 된 뼈가 있는 절인 고기 제품

2. 고위험(High Risk) - 기타 모든 가공되지 않은 육류 제품

■ 수입절차

○ 단기

저위험(Low Risk)	고위험(High Risk)
수입업자는 아래의 필수 서류 목록을 작성하여 제출해야함. - 제품 리스트 - 제품 등록을 위한 요구되는 필수 서류 ● 정부 기관에서 인증한 제조 절차 공정도 (제품 등록시) ● Sorbor 5 또는 Sorbor7 [태국 FDA 제품 등록 서류] ● License per invoice[LPI] - 이 서류는 2018년 9월 9일 이전에 수의 검사 검역 부서에 제출되어야 함	수입업자는 아래의 필수 서류 목록을 작성하여 제출해야함. - 제품 리스트 - 제품 등록을 위한 요구되는 필수 서류 ● 정부 기관에서 인증 한 제조 절차 공정도 (제품 등록시) ● Sorbor 5 또는 Sorbor7 [태국 FDA 제품 등록 서류] ● License per invoice[LPI] - 2018년 9월 9일 이전에 태국 FDA에 이미 등록된 제품은 정상적으로 수입 가능함 - 2018년 12월 30일 이전에 수입업자는 수의 검사 검역 부서에 편지를 보내 태국 정부가 제조 시설에 대한 감사를 실시하도록 초청하여야 함

○ 장기

두 제품 그룹(저위험 및 고위험)은 아래를 법규를 준수하여야 함

- 축산국(DLD) 재허가 요청의 관한 공고문
- 수입허가 발행
- 태국 내 동물 또는 동물의 지육의 수입, 수출 및 운송의 관한 절차

ประกาศกระทรวงเกษตรและสหกรณ์

เรื่อง กำหนดอาหารสุกที่ทำ ประกอบ หรือปรุงจากซากสัตว์
เป็นซากสัตว์ตามพระราชบัญญัติโรคระบาดสัตว์ พ.ศ. ๒๕๕๘
พ.ศ. ๒๕๖๑

โดยที่เป็นการสมควรควบคุมการนำเข้า ส่งออก หรือนำผ่านซึ่งอาหารสุกที่ทำ ประกอบ หรือปรุงจากซากสัตว์เพื่อประโยชน์ในการป้องกันและควบคุมโรคระบาด

อาศัยอำนาจตามบทนิยามคำว่า “ซากสัตว์” ตามมาตรา ๔ ประกอบมาตรา ๕ แห่งพระราชบัญญัติโรคระบาดสัตว์ พ.ศ. ๒๕๕๘ รัฐมนตรีว่าการกระทรวงเกษตรและสหกรณ์ จึงออกประกาศไว้ ดังต่อไปนี้

ข้อ ๑ ประกาศฉบับนี้ให้ใช้บังคับเมื่อพ้นกำหนดหกสิบวันนับตั้งแต่วันถัดจากวันประกาศ ในราชกิจจานุเบกษาเป็นต้นไป

ข้อ ๒ ในประกาศนี้

“อาหารสุก” หมายความว่า สิ่งนั้นสามารถใช้รับประทานเป็นอาหารได้ทันที และให้หมายความรวมถึงสิ่งนั้นต้องนำไปดำเนินการวิธีขึ้นต่อไปอีกจึงจะรับประทานได้

ข้อ ๓ ให้อาหารสุกที่ทำ ประกอบ หรือปรุงจากซากสัตว์ดังต่อไปนี้เป็นซากสัตว์ตามมาตรา ๔ แห่งพระราชบัญญัติโรคระบาดสัตว์ พ.ศ. ๒๕๕๘ เฉพาะการนำเข้า ส่งออก หรือนำผ่านราชอาณาจักร

- (๑) ไส้กรอกทุกชนิด (Sausages)
- (๒) กุนเชียง (Chinese Sausages)
- (๓) แหนม หรือจิ้นส้ม (Sour pork sausages)
- (๔) มัม หรือหม่า หรือซาลามิ (Salami)
- (๕) แฮมทุกชนิด (Ham)
- (๖) เบคอนทุกชนิด (Bacon)
- (๗) เนื้อสัตว์รมควัน ดังต่อไปนี้
 - (ก) เนื้อโครมควัน (Smoked beef)
 - (ข) เนื้อหมูรมควัน (Smoked pork)
 - (ค) เนื้อแกะรมควัน (Smoked mutton)
 - (ง) เนื้อแพะรมควัน (Smoked goat)
 - (จ) เนื้อไก่รมควัน (Smoked chicken)
 - (ฉ) เนื้อเป็ดรมควัน (Smoked duck)

- (ข) เนื้อห่านรมควัน (Smoked goose)
- (ช) เนื้อไก่วงรมควัน (Smoked turkey)
- (ฌ) เนื้อนกกระจอกเทศรมควัน (Smoked ostrich)
- (๘) เนื้อสัตว์ดอง ดังต่อไปนี้
 - (ก) เนื้อโคดอง (Pickle beef)
 - (ข) เนื้อหมูดอง (Pickle pork)
 - (ค) เนื้อแกะดอง (Pickle mutton)
 - (ง) เนื้อแพะดอง (Pickle goat)
 - (จ) เนื้อไก่ดอง (Pickle chicken)
 - (ฉ) เนื้อเป็ดดอง (Pickle duck)
 - (ช) เนื้อห่านดอง (Pickle goose)
 - (ซ) เนื้อไก่วงดอง (Pickle turkey)
 - (ฌ) เนื้อนกกระจอกเทศดอง (Pickle ostrich)
- (๙) เนื้อสัตว์หมักเกลือ ดังต่อไปนี้
 - (ก) เนื้อโคหมักเกลือ (Cured beef)
 - (ข) เนื้อหมูหมักเกลือ (Cured pork)
 - (ค) เนื้อแกะหมักเกลือ (Cured mutton)
 - (ง) เนื้อแพะหมักเกลือ (Cured goat)
 - (จ) เนื้อไก่หมักเกลือ (Cured chicken)
 - (ฉ) เนื้อเป็ดหมักเกลือ (Cured duck)
 - (ช) เนื้อห่านหมักเกลือ (Cured goose)
 - (ซ) เนื้อไก่วงหมักเกลือ (Cured turkey)
 - (ฌ) เนื้อนกกระจอกเทศหมักเกลือ (Cured ostrich)
- (๑๐) เนื้อสัตว์เบอร์เกอร์ ดังต่อไปนี้
 - (ก) เนื้อโคเบอร์เกอร์ (Beef burger)
 - (ข) เนื้อหมูเบอร์เกอร์ (Pork burger)
 - (ค) เนื้อไก่เบอร์เกอร์ (Chicken burger)
 - (ง) เนื้อไก่วงเบอร์เกอร์ (Turkey burger)
 - (จ) เนื้อนกกระจอกเทศเบอร์เกอร์ (Ostrich burger)
 - (ฉ) เนื้อแกะเบอร์เกอร์ (Mutton burger)
 - (ช) เนื้อแพะเบอร์เกอร์ (Goat burger)

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- (๑๑) น้ำผึ้งทุกชนิด (Honey)
 - (๑๒) รวงผึ้ง หรือรังผึ้ง (Honeycomb)
 - (๑๓) นมผึ้ง (Royal jelly)
 - (๑๔) ไข่เค็มที่ยังไม่ผ่านการต้มสุก หรือไข่แดงเค็ม (Salted eggs or salted egg yolks)
 - (๑๕) ไข่เยี่ยวม้า (Preserved eggs)

ประกาศ ณ วันที่ ๑๓ มิถุนายน พ.ศ. ๒๕๖๑

ลักษณะ วจนานวัช

รัฐมนตรีช่วยว่าการกระทรวงเกษตรและสหกรณ์ ปฏิบัติราชการแทน

รัฐมนตรีว่าการกระทรวงเกษตรและสหกรณ์

Guideline to Notification of the Ministry of Agriculture and Cooperatives

Re: Prescribe Cooked Food Made from Animal Carcass as Animal Carcass According to Animal Epidemic Act B.E. 2558 B.E. 2661

Source: Notification of the Ministry of Agriculture and Cooperatives Re: Prescribe Cooked Food Made from Animal Carcass as Animal Carcass According to Animal Epidemic Act B.E. 2558 B.E. 2661

Procedures:

- **Product Classification Based on Importing Risk (OIE principle)**

1. Low risk, Processed

- a. Cooked: All parts of the food were heated to no less than 70 degree Celsius for a minimum of 30 minutes
- b. Dry cured bone-in meat products that are cured with salt and dried for a minimum of 313 days

2. High risk: All other non-processed meat products

- **Import Procedures**

- Short term

Low Risk	High Risk
The importer is required to prepare and submit required documents list below: - Product list - All required documents for product registration: ○ Manufacturing procedure flow chart that is certified by the government authority (for product registration) ○ Sorbor 5 or Sorbor 7 [a Thai FDA product registration document] ○ License Per Invoice (LPI) The documents should be submitted to the Division of Veterinary Inspection and Quarantine for shipment clearance before September 9, 2018	The importer is required to prepare and submit required documents list below: - Product list - All required documents for product registration: ○ Manufacturing procedure flow chart that is certified by the government authority (for product registration) ○ Sorbor 5 or Sorbor 7[a Thai FDA product registration document] ○ License Per Invoice (LPI) - Products already registered with the Thai Food and Drug Administration (Thai FDA) prior to September 9, 2018 are able to be imported as normal. - Prior to December 30, 2018, the importer submits a letter to the Division of Veterinary Inspection and Quarantine inviting the Thai government to conduct an audit for the manufacturing facility

- Long term

Both product groups (low and high risk) are required to comply with the Department of Livestock Development Notification Re Permission Request, Import Permit Issuance, Procedures for Import, Export, and Transit of Animal or Animal Carcass in the Kingdom of Thailand B.E. 2558.