



# **Nota para exportadores de productos cárnicos a Japón**

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Oficina Económica y Comercial  
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# 1. CONTENIDO

La exportación de productos cárnicos de cerdo fue autorizada por las autoridades japonesas en el año 1999 y dio comienzo a partir del 2000.

No obstante, esta tuvo que ser suspendida durante los años 2001 y 2002 con motivo de los brotes de peste porcina, reanudándose a partir de febrero de 2003.

Para la exportación de los mencionados productos, es necesario cumplir el protocolo establecido por las autoridades de ambos países. Se ruega leer detenidamente el contenido del protocolo.

<http://www.maff.go.jp/aqs/hou/require/pdf/14-996sp.pdf>

(A la versión en japonés sigue el texto en inglés.)

Hay una serie de requisitos que los exportadores deben tener en consideración en el momento de la exportación, los cuales se detallan a continuación.

Al mismo tiempo, en la página web del Ministerio de Agricultura y Pesca, Alimentación y Medio Ambiente español se puede encontrar abundante información acerca de la exportación a Japón. Rogamos visite esta página también (introduzca 'Japón' en el buscador).

[Enlace a la web del MAGRAMA](#)

## 1.1. HOMOLOGACIÓN

Las empresas que deseen exportar carne fresca, refrigerada o congelada, jamones u otros embutidos deben estar homologadas por el Ministro de Sanidad, Servicios Sociales e Igualdad español, así como por el Ministerio de Agricultura y Pesca, Alimentación y Medio Ambiente español, con el objeto de que puedan figurar en la lista de establecimientos reconocidos por el Ministerio de Agricultura japonés. La homologación se requiere aunque sea únicamente para el envío de muestras.

La homologación deben realizarla no solo las empresas exportadoras de la industria cárnica, sino también otros establecimientos adjuntos (mataderos, salas de despiece, almacenes frigoríficos y centros de re-envasado).

Los fabricantes de platos preparados que contengan trozos de carne o jamón, como por ejemplo las croquetas, también tienen que estar homologadas para la exportación a Japón, por muy pequeño que el porcentaje de carne o embutido sea.

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### Nota informativa MAGRAMA

## 1.2. DOCUMENTACIÓN

La exportación de productos cárnicos requiere la presentación de los siguientes documentos:

- Certificado de sanidad animal.
- Monografía (flow chart), solamente para el primer envío, en inglés o japonés.
- Certificado de análisis de aditivos emitido por un laboratorio oficial de España reconocido por el Gobierno japonés.
- Factura
- Packing list

## 1.3. CERTIFICADO DE SANIDAD ANIMAL (Mº AGRICULTURA Y PESCA, ALIMENTACIÓN Y MEDIO AMBIENTE)

La mercancía deberá venir acompañada del certificado de sanidad animal homologado por las administraciones española y japonesa. Dicho certificado deberá estar bien cumplimentado. Si se emplean carnes importadas de otros países, éstas deberán proceder del denominado grupo cero (países autorizados por Japón); en estos casos el certificado de sanidad deberá ir acompañado de la copia del certificado de sanidad animal del país de origen.

Se puede acceder al modelo del certificado a través de la web del MAGRAMA.

[Modelo del certificado sanitario](#) (y buscar “Japón”)

Igualmente, habrá que tener en cuenta los siguientes puntos:

- Se deberán consignar todos los datos de la razón social y dirección completa del establecimiento desde el que se expidan los productos (dirección, municipio, y provincia) tal y como aparecen en las listas de establecimientos homologados para exportar a Japón. Es importante tener cuidado con el uso de abreviaturas al escribir la dirección del establecimiento, no se deben utilizar términos que no figuren en la lista. Por ejemplo, escribir “CTRA.” cuando en la dirección registrada figura “CARRETERA” (o viceversa) será considerado discrepancia documentaria por los inspectores japoneses, que desconocen las abreviaturas que se utilizan en la lengua española.
- Si la dirección figura en la lista en lengua catalana, debe escribirse en el certificado también en catalán.
- Se deberá expresar de forma clara la cantidad exacta de productos contenidos en las cajas. En caso de que el volumen de la mercancía sea mayor al declarado, éste será destruido.
- La descripción técnica de la mercancía deberá ser expresada con claridad (como por ejemplo la correcta designación del origen de las tripas). Su incorrecta descripción será motivo de rechazo o retraso en los trámites aduaneros.

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- En cuanto al uso de tripas para embutidos, únicamente se autoriza la tripa natural de cerdo.

### 1.4. MONOGRAFÍA

En virtud de la ley japonesa, está establecido un reglamento para elaborar productos cárnicos, con lo que los productos que se distribuyan en Japón tienen que cumplir esa ley. Es de gran importancia el conocimiento detallado de esa ley. Hay que fijarse especialmente en el uso de aditivos (por ejemplo, nitrato sódico o potasio), la temperatura durante la curación del jamón y los días mínimos de duración. Con todo, el reglamento se puede consultar en el anexo de esta nota.

### 1.5. ENVASADO

El envase del producto también se encuentra sujeto a la legislación sanitaria japonesa, tal y como queda expresado en el siguiente párrafo; "*shall be sealed in clean and sanitary containers, packed in casings, or wrapped in clean and sanitary plastic film, plastic-processed paper, sulphuric acid paper, or paraffin paper for transportations*".

Con base en experiencias anteriores, se recomienda que la caja esté doblemente embalada. Es decir, un embalaje interior a que contenga el producto, debidamente etiquetado y con el lote claramente identificado, y estos a su vez empaquetados en un embalaje externo que debe ir precintado.

### 1.6. TRANSPORTE

El contenedor debe estar precintado por la autoridad española. Es recomendable consultar acerca de los detalles del precinto con el transportista antes de hacer el envío.

La pérdida, rotura o apertura del precinto durante el transporte puede llegar a causar el rechazo de la mercancía en las aduanas japonesas, con lo que debe efectuarse este trámite con la debida cautela.

En el Protocolo se hace mención únicamente al precinto del contenedor. No obstante, en la práctica es muy poco habitual que un contenedor aéreo vaya cargado exclusivamente de piezas de jamón. Ante esta situación el Protocolo guarda silencio, con lo que en la práctica no se están poniendo problemas, con la excepción de que el medio de transporte haga escala en un país clasificado por Japón como 'no libre de enfermedades' (gran parte de los países asiáticos). Se ruega observar la lista de países libres (no afectados por enfermedades) que publica el MAFF.

[Lista de países libres de enfermedades](http://www.maff.go.jp/aqs/english/news/third-free.html) <http://www.maff.go.jp/aqs/english/news/third-free.html>

### 1.7. OFICINA DE CUARENTENA EN JAPÓN (COMPETENCIA DEL Mº DE AGRICULTURA)

Una vez que la mercancía llega a Japón, la oficina de cuarentena examina el certificado de sanidad animal (nótese que sólo se aceptarán documentos originales, nunca copias). Aunque la mercancía esté destinada a muestras para alguna feria, siempre le serán exigibles los mismos trámites que a una mercancía con destino comercial.

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### 1.8. CONTROL DEL Mº DE SANIDAD JAPONÉS

Una vez finalizado el trámite en la Oficina de Cuarentena, se procede con el control del Ministerio de Sanidad, mediante el cual se analiza la eventual presencia de residuos químicos, aditivos, microorganismos (listeriosis, E. Coli, salmonela, estafilococos, etc.), actividad del agua, así como otros análisis sanitarios sobre producto. En caso de que el envase no reúna las condiciones sanitarias óptimas no podrá pasar el control sanitario.

Nótese que con anterioridad se ha rechazado y devuelto mercancía que llegó con el embalaje roto e impregnado de grasa. Por favor, revise las especificaciones de la norma que se encuentran al final de esta nota. Asimismo, ha habido casos en los que la mercancía no ha sido despachada por la temperatura a la que se ha elaborado el jamón.

Según informaciones facilitadas por los importadores, el control de sanidad japonés corta una parte de jamón o bien se extrae una parte de la mercancía para proceder a su análisis. Este trámite solo se aplica al primer envío, siempre y cuando se trate de "importación continua", entendiéndose por continua aquellas que se realizan de forma repetitiva a lo largo del año. Para ello, los exportadores deberán en todo momento utilizar las mismas descripciones en los productos. El análisis realizado en la aduana tiene una validez de un año.

Generalmente, los trámites de estos dos controles de aduanas (puntos 7 y 8) tienen una duración de 5 días hábiles, si no surge ningún inconveniente.

### 1.9. ETIQUETADO

A su vez, los importadores o distribuidores deben preparar el contra etiquetado en japonés de los productos, de acuerdo con la legislación japonesa. En el caso de los jamones curados, a parte de las indicaciones necesarias, se deberá consignar el grado de la actividad de agua, las instrucciones de conservación (menos de 10°C) e indicar que se trata de productos "*Hi kanetsu shokuhin seihiin*" (productos cárnicos sin cocinar, unheated meat products).

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### ANEXO: Reglamento japonés para elaborar productos cárnicos (MHLW)

Los jamones españoles son considerados normalmente como ‘productos cárnicos curados o sin cocinar’. Los otros derivados cárnicos serán considerados ‘productos curados’ o ‘productos secos’ en función de la actividad del agua a la que sean sometidos.

#### IV Meat and Meat Products

##### Appendix III

###### Meat Products

###### 1. Specifications of composition for Meat Products

###### (1) General Specifications.

Meat Products shall not contain nitrite radicals exceeding 0.070 grams for every 1 Kg of meat products.

###### (2) Individual Specifications.

1. Dried Meat Products (which means such meat products that are dried and sold as dried meat products. This definition shall apply hereinafter.) shall comply with the following specifications:

a. It shall be E.Coli negative (Among the E. Coli , in case it is incubated at 44.5°C for 24 hours, the ones which decompose lactose and generate acid and gases.)

b. Water Activity shall be less than 0.87.

2. Unheated Meat Products (which means such meat products that have been smoked or dried after being salted, but which have not undergone thermal sterilization such as heating the central part at 63° C for 30 minutes , or by a method equivalent to or more effective , and which are sold as unheated meat products. However, dried meat products shall be excluded. The same definition shall apply hereinafter.) shall comply with the following specifications:

a. The E. Coli count shall be 100 or less for every 1 gram of the specimen.

b. The Staphylococcus Aureus count shall be 1,000 or less for every 1 gram of the specimen.

c. It shall be free of Salmonella (Gram-negative, non-spore forming, rod-shaped bacteria which decomposes glucose but does not decompose lactose and saccharose, and which is anaerobic, and possesses mobility. The same definition shall apply hereinafter.)

3. Specific Heated Meat Products (which means such meat products which have been thermally sterilized by methods other than heating the central part of the meat product at 63° C for 30 minutes , or methods equivalent to or more effective than this method. However, dried meat products and unheated meat products shall be excluded. The same definition shall apply hereinafter.) shall comply with the following specifications:

a. The E. Coli count shall be 100 or less for every 1 gram of the specimen.

b. The Clostridium (gram-positive, spore-forming, rod shaped bacteria which is anaerobic and reduces nitric acid. The same definition shall apply hereinafter.) count shall be 1,000 or less for every 1 gram of the specimen.

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C. The Staphylococcus Aureus count shall be 1,000 or less for every 1 gram of the specimen.

D. It shall be free of Salmonella.

4. Among the heated meat products (which means such meat products other than dried meat products, unheated meat products, and specific heated meat products. The same definition shall apply hereinafter.), the ones which have been thermally sterilized after putting them into container packages shall comply with the following specifications.

a. It shall be free of E.Coli.

b. The Clostridium shall be 1,000 or less for every 1 gram of the specimen.

5. Among the heated meat products, the ones which are put into the container packages after thermal sterilization shall comply with the following specifications:

a. It shall be free of E. Coli.

b. The Staphylococcus count shall be 1,000 or less for every 1 gram of the specimen.

c. It shall be free of Salmonella.

### 2. Standard Procedure of Manufacturing for Meat Products

#### General Standards.

Meat products shall be manufactured by methods which comply with the following standards.

1. Raw Materials meat used in the manufacturing shall be fresh with least microbial contamination.

2. The defrosting of frozen raw material shall be performed in a sanitary place. In this case, any water used shall be running water suitable for drinking.

3. Meat shall be stored in clean and readily washable,impermeable type containers made of metal, plastics, etc.

4. Spices, sugar, and starch used for manufacturing shall have a spore count f 1,000 or less for every 1 gram of the material.

5. For manufacturing, clean utensils which can be easily washed and disinfected , shall be used.

#### (2)Individual Standards

##### 1. Dried meat Products

Dried meat products shall be manufactured by a method which comply with the following standards

a. Smoking or drying shall be performed to attain a water activity of less than 0.87 while maintaining the temperature of the product at 20°C or below, or 50°C or above, or maintaining conditions equal to or better than the above conditions in order to prevent the propagation of microbes. In case smoking or drying while keeping the temperature of the product at 50°C or above , the time duration which the temperature exceeds 20°C , but is below 50° C , shall be minimized as much as possible.

b. The handling of the products during smoking or drying shall be done under sanitary conditions.

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### 2. Unheated Meat Products

Unheated meat products shall be manufactured by a method which complies with one of the following standards.

A. In case only raw material meat lumps (A uniform lump of meat (internal organs (viscera) are excluded). This definition shall apply hereinafter.) are used.

1) Raw material meat used for manufacturing shall be cooled to 4°C or below within 24 hours after slaughtering the animal , and after cooling it, it shall be stored at a temperature maintained at 4°C or below, in addition, the pH of the meat shall be 6.0 or below.

(2) During the defrosting of the frozen raw material used for manufacturing the temperature of the meat shall not exceed 10°C.

(3) During the forming of raw material meat used for manufacturing , the temperature of the meat shall not exceed 10°C.

(4) In case the meat is salted by using sodium nitrite, it shall be done in accordance with the following method.

a. The salting of meat shall be performed to attain a water activity of less than 0.97 in a lump state by dry salting method , saline solution method, or impregnation method (hereinafter referred to as "one-needle impregnation method.") in which hand work employing one needle is conducted. The meat shall be kept at 5°C or below.

However, in case the water activity of the final product is 0.95 or above, this water activity requirement need not apply.

In case the product is manufactured by the dry salting method, 6% or more sodium chloride, potassium chloride , or their combination shall be used on the weight of the meat. In addition, 200 ppm or more sodium nitrite shall be used.

In the case of saline solution method or one-needle impregnation method , 15 % or more sodium chloride , potassium chloride, or their combination shall be used on the weight of the meat. In addition, saline solution containing 200 ppm or more sodium nitrite shall be used in the manufacture. In the case of saline solution method , the meat shall be thoroughly soaked the saline solution.

b. In case desalting of the salted meat is done, potable water of 5°C or below shall be used , and the water shall be changed from time to time.

c. Smoking or drying shall be performed to attain a water activity of less than 0.95 by using metal lump as it is, and keeping the temperature of the product at 20°C or below, or 50°C or above. However, in case the water activity of the final product is 0.95 or above , the aforementioned water activity requirement activity need not apply.

When smoking or drying is performed by keeping the product temperature at 50°C or above , the time duration during which the temperature exceeds 20° C or falls below 50°C, shall be minimized as much as possible.

(5) When meat is salted without using sodium nitrite , it shall be done in accordance with the following method:

The salting of the meat shall be performed by dry salting method and the meat shall used in the lump form.

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While maintaining the temperature of the meat at 5°C or below, 6% or more sodium chloride , potassium chloride or their combination shall be used on the weight of the meat, and they shall be applied thoroughly to the surface of the meat other than the fat portion, and conducted for a period of 40 days or more.

In case washing the surface of the salted meat, cold potable water shall be used and the water shall be changed from time to time.

Smoking or drying shall be performed to attain the water activity of less than than 0.95 in lump fprm. While maintaining the temperature of the product at 20°C or below, continue this for 53 days or more.

(6)The handling of the product after smoking or drying shall be done under sanitary conditions.

B. In case of using raw material meat other than only meat lumps.

1. During the defrosting of frozen raw material meat used for the manufacture of meat products shall be done so that the meat temperature does not exceed 10°C.

2. During the forming raw material meat used for the manufacturing, the temperature of the meat shall not exceed 10°C.

3. The raw material meat used for the manufacturing, must be cut so that the major diameter will be 20 mm or less.

4. The salting of meat (Bones and fats shall be excluded). Shall be done by using 3.3% or more sodium chloride, potassium chloride, or their combination on the weight of the meat. In addition , it shall be done by using 200 ppm or more sodium nitrite.

5.In case desalting of the salted meat is done, potable water of 5°C.or below shall be used, and the water shall be changed from time to time.

6.Smoking or drying shall be performed for a period of 20 days or more, while maintaining the product temperature to 20°C or below, to attain the pH at less than 5.0 , and the water activity at less than 0.91, (In case smoking or drying is done at a product temperature of 15°C or above, the pH shall be less than 5.4 and the water activity shall be less than 0.91) or it shall be performed to attain until the pH is less than 5.3 and the water activity is less than 0.96. However, in the case of meat products to be stored at room temperature, the smoking or drying shall be performed to attain until the pH is less than 4.6 or the pH is less than 5.1 , and the water activity is less than 0.93.

7. In the case of a through c shown below, the use of sodium chloride , potassium chloride , or their combination specified in (4) and smoking or drying period specified in (6) shall not apply.

- a. In case meat products are manufactured by raw material meat of which the central part of the meat shown in Column 1 of the following table is frozen under the temperature classification shown in Column 2 of the same table for a period shown in Column 3 of the same table or frozen by a method equal to or more effective than the aforementioned method.

Column 1	Column 2	Column 3
Meat having a thickness of 150 mm or less.	Temperature of -29°C or below.	6 days

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Meat having a thickness of above 150 mm but less than 675 mm.	Temperature above -29°C , but -24°C or below. Temperature above -24°C , but -15°C or below. Temperature of -29°C or below. Temperature above -29°C , but -24°C or below. Temperature above -24°C , but -15°C or below.	10 days 20 days  12 days 20 days 30 days

- b. In case of manufacturing meat products by using heated as the raw material meat of which the central part is in accordance with the temperature classification shown in Column 1 of the following table and heated by a method equal to or more effective than the aforementioned method. (However, this shall be restricted to the case in which the time that the meat temperature is in range of above 20°C and lower than 50°C is within 120 minutes.)

Column 1	Column 2
50°C	580 minutes
51°C	300 minutes
52°C	155 minutes
53°C	79 minutes
54°C	41 minutes
55°C	21 minutes
56°C	11 minutes
57°C	6 minutes
58°C	3 minutes
59°C	2 minutes
60°C	1 minute
63°C	Instantaneous

- c. In case manufacturing is done so that the water activity of the meat product will be less than 0.91.

(8) The handling of the product after smoking or drying shall be done under sanitary conditions.

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### 3. Specific Heated Meat Products

Specific heated meat products shall be manufactured by a method which complies with the following standards.

- a. Raw material meat is used for the manufacturing shall be cooled to 4°C or below , in addition the pH of the meat shall be 6.0 or below.
- b. During the defrosting of the frozen raw material meat used for manufacturing , the temperature of the meat shall not exceed 10°C.
- c. During the forming of the raw material meat for manufacturing , the meat temperature shall not exceed 10°C.
- d. In case the meat is salted, lump meat shall be used, and dry salting method or saline solution method shall be employed.
- e. In case of desalting of the salted meat is done , potable water of 5°C or below shall be used, and the water shall be changed from time to time.
- f. In case seasoning materials are used in the manufacture, they shall be applied only to the surface of the meat.
- g. The meat product shall be in the form of a lump, and the central part of the meat shall be heated to the temperature classification of Column 1 in the following table and heated for the time shown in Column 2 of the same table , or it shall be sterilized by a method equal to or more effective than the aforementioned method. In this case, a state in the time duration during which the temperature of the central part of the product exceeds 35°C, and falls below 52°C shall be within 170 minutes.

Column 1	Column 2
55°C	97 minutes
56°C	64 minutes
57°C	43 minutes
58°C	28 minutes
59°C	19minutes
60°C	12 minutes
61°C	9 minutes
62°C	6 minutes
63°C	Instantaneous

- h. Cooling after thermal sterilization shall be done thoroughly in a sanitary place. In this case, the time duration which the central part of the meat product exceeds 25°C, or falls below 55°C shall be within 200 minutes. In case water is used for cooling, potable running water shall be used.

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i. The handling of the product after cooling shall be done under sanitary conditions.

### 4. Heated Meat Products.

Heated Meat products shall be manufactured by a method which complies the following standards.

a. The products shall be sterilized by a method of heating their central part at 63°C for 30 minutes or a method equal to or more effective than the aforementioned method. (In the case of products which contain fish meat and which are sterilized after being filled into airtight container packages , a method of heating their central part at 80°C for 20 minutes or a method which is equal to or more effective than the aforementioned method, and sterilized , shall be used.

b. The products shall be allowed to stand for a sufficient period of time to cool after thermal sterilisation in a sanitary place. If water is used in this case , cooling shall be performed by potable running water.

c. In the case of products which have been put into container packages after thermal sterilization , the handling after cooling shall be done under sanitary conditions.

5. A person who intends to manufacture meat products by salting , smoking , drying or sterilization in accordance with methods other than those provided in (2) -1, -2. -3, and -4 of this item, or who intends to import meat products manufactured by salting , smoking , drying or sterilization in accordance with methods other than those provided in (2) -1, -2. -3, and -4 of this item, shall obtain the approval of the Minister of the Public Welfare.

### 3. Standard Procedures for Storing Meat Products

#### (1) General Standards

1. Frozen meat products (meat products which are sold as frozen meat products shall be stored at -15°C or below.

2. Products shall be sealed in clean sanitary containers packed in casings or wrapped in clean , sanitary plastic film, plastic-processed paper , sulfuric acid paper, or paraffin paper for transport.

#### (2) Separate Standards

##### 1. Unheated Meat Products

Among the unheated meat products, in the case of the ones which have water activity of 0.95 or above shall be stored at 10°C or below.

However, in cases other than when only meat lumps are used as raw material meat, if the pH is less than 4.6 or the pH is less than 5.1 and in addition, the water activity is less than 0.93, the aforementioned requirements need not apply.

##### 2. Specific Heated Meat Product

Among the specific heated meat products, the ones, which have water activity of 0.95 or above, shall be stored at 4°C or below, and ones which have water activity of less than 0.95 shall be stored at 10°C or below.

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Heated meat products shall be stored at 10°C or below. However, after being filled into airtight container packages, if they are sterilized by the method of heating the central part at 120°C for 4 minutes , or methods equal to or more effective than this method, this requirement need not apply.