

非關稅貿易障礙之排除建議

1. 邊境完成貼標輸入造成時間人力障礙，應放寬給有管理規模及專業能力之經營廠商於境內完成中文標示，此舉可減少標示不合格的案件累積。市面上之食品標示查核結果顯示；未貼中文標示者大多為電商少量進口產品，邊境不宜藉此原因投入大量人力(藥品、醫療器材、化妝品、酒類及其他簽審單位管理之產品類別皆未要求於邊境管制中文標示)。另外，包含中國上海與台灣貿易往來各國皆未強制規定食品輸入前要完成中文標示，因此，台灣應參考國際慣例與其他產品類別的管理經驗，適度放寬食品中文標示的邊境管制要求，允許具備管理規模與專業能力的進口商在境內完成標示，並輔以完善的追蹤與稽查機制。
2. 高風險易腐生鮮冷凍產品，海關尚未建置良好環境之前應放寬具結條件。
3. 中壢辦事處撤站，回歸每半日集中派驗機制。
4. 紓解邊境食品中文標示查核業務後，再考慮將進口化妝品納入查驗機制。
5. 食品標示 QR CODE 勢在必行，配合優良廠商輸入後完成食品中文標示一次定稿避免二次重工，減少邊境壓力。
6. 進口食品營養標示真實性問題值得關注。例如：日本標示多為推定值，且糖值不等於台灣六碳糖，脂值與脂肪、飽和脂肪酸、反式脂肪定義不同。然而，現行台灣邊境允許將日本八大營養標示的部分數據與進口商檢驗結果合併(如糖類&脂肪酸)，形成完整標示。此作法可能導致數據不精確，影響消費者權益。建議政府統一檢驗標準，要求進口食品應持有完整合理依據之八大營養素檢測結果，製作符合台灣規範的中文標示，確保數據一致性與真實性，提升食安信賴度。

Recommendations for the Removal of Non-Tariff Trade Barriers

Dear Representative,

I, Raymond Wu, am writing this proposal on behalf of Sang Shing Inspection & Quarantine Co., Ltd., a Taiwan-based company specializing in facilitating the removal of non-tariff trade barriers for food imports into Taiwan. U.S. food imports represent a substantial portion of our business, with our client portfolio including prominent companies such as Costco 、 Abbott 、 McDonald's 、 Heinz Ketchup 、 Green Giant (corn) and various stakeholders in the U.S. poultry and livestock industries. In 2023, our company accounted for 26% of all food import declarations in Taiwan, reflecting our significant role in this sector.

Through years of operation, we have identified non-tariff trade barriers as the primary obstacle to U.S. food imports into Taiwan. Of these, the regulation mandating Chinese labeling prior to importation has the most substantial impact on import costs. Notably, within the Asia-Pacific region, Taiwan remains the only jurisdiction that enforces such a pre-importation Chinese labeling requirement. In alignment with the tariff policy and barrier removal initiatives under the administration of U.S. President Trump, we propose actionable recommendations to address these challenges, fostering mutual benefits for both Taiwan and the U.S. In addition to submitting this proposal to your esteemed organization, we will also present these recommendations to the relevant authorities within the Taiwanese government for further consideration.

I am writing to propose several recommendations aimed at addressing non-tariff trade barriers. Please find the details below:

1. **Labeling at the Border:** The requirement for labeling to be completed at the border creates significant time and manpower obstacles. It is suggested that this restriction be release to allow manufacturers with established management scales and professional capabilities to complete Chinese labeling within the country. This measure could reduce the accumulation of non-compliant labeling cases. Market data from food labeling inspections indicates that products lacking Chinese labels are predominantly small-quantity imports via e-commerce. Therefore, it is not advisable to allocate substantial manpower at the border for this purpose, especially since products managed by agencies such as the Taiwan Food and Drug Administration (e.g., pharmaceuticals, medical devices, cosmetics, alcoholic beverages, and other categories) are not required to undergo Chinese labeling inspections at the border.

2. **High-Risk Perishable Fresh and Frozen Products:** Until the customs authorities establish a suitable environment, it is recommended to prior release for these products (Please refer to TFDA “Regulations of Inspection of Imported Foods and Related Products”- Chapter 6, article 19).
3. **Closure of the Zhongli Office:** The Zhongli office should be closed, with operations reverting to a centralized inspection mechanism conducted twice daily.
4. **Consideration of Imported Cosmetics:** After alleviating the burden of Chinese food labeling inspections at the border, the inclusion of imported cosmetics in the inspection mechanism can be reconsidered.
5. **Implementation of QR Codes for Food Labeling:** The adoption of QR codes for food labeling is imperative. By collaborating with reputable manufacturers to finalize Chinese food labels post-importation in a single process, secondary rework can be avoided, thereby reducing pressure at the border.

I hope these suggestions will be taken into consideration to facilitate smoother trade processes. Thank you for your attention to this matter. We look forward to your feedback.

Best regards,
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General Manager

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