



WORLD TRADE ORGANIZATION'S TRADE FACILITATION AGREEMENT ARTICLE 6:

ANALYSIS OF MOZAMBIQUE'S DISCIPLINE ON FEES AND CHARGES

Supporting the Policy Environment for Economic Development (SPEED+)

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ACRONYMS

ACP	Africa Caribbean and Pacific
APIEX	Agency for Investments and Exports Promotion
AT	Mozambique Tax Authority
CDA	Chamber of Customs Brokers of Mozambique
CIF	Cost, Insurance and Freight
CTA	Confederation of Business Associations
DGA	General Directorate of Customs
DNAV	National Directorate of Veterinary Services
DNF	National Directorate of Forest
DNF	National Directorate of Pharmacy
DNSA	National Directorate of Agricultural Services
DPASA	Provincial Directorate of Agriculture and Food Security
DPIC	Provincial Directorate of Industry and Commerce
DU	Single Document
DUA	Abbreviated Document
DUS	Simplified Document
FOB	Free on Board
GATT	General Agreement on Tariff and Trade
GoM	Government of Mozambique
IAM	National Cotton Institute
IIAM	Agricultural Research Institute
INIP	National Institute of Fish Inspection
KM	Kilometer
LNCQM	National Laboratory of Quality Control of Medicines
MASA	Ministry of Agriculture and Food Security

MCNET	Mozambique Community Network
MEF	Ministry of Economy and Finance
MIC	Ministry of Industry and Commerce
MIMAIP	Ministry of Sea, Inland Waters and Fisheries
MINT	Ministry of Home Affairs
MISAU	Ministry of Health
MT	Mozambique currency (Meticais)
MTC	Ministry of Transport and Communications
NII	Non-Intrusive Inspection
NTFC	National Trade Facilitation Committee
PRM	Mozambique Police
PSI	Pre-Shipment Inspection
SADC	Southern Africa Development Community
SW	Electronic Single Window
SPEED+	Policy Environment for Economic Development
SPFFB	Provincial Forest and Wildlife Services
SPP	Provincial Department of Veterinary Services
TFA	Trade Facilitation Agreement
TSA	Customs Service Fee
USAID	United States Agency for International Development
US\$	United States Dollar
WAHID	World Animal Health Information Database
WTO	World Trade Organization

CONTENTS

ACKNOWLEDGEMENTS.....	III
PROJECT DETAILS	IV
ACRONYMS.....	V
CONTENTS.....	VII
LIST OF TABLES	IX
LIST OF FIGURES	IX
EXECUTIVE SUMMARY.....	X
1. INTRODUCTION	11
1.1. Context	11
1.2. Objective and approach	11
1.3. Scope	11
1.4. Structure of the report	12
2. RELEVANT BACKGROUND INFORMATION.....	13
2.1. Understanding the context of fees and charges for trade related services	13
2.1.1. Public institutions	13
2.1.2. Private companies	15
2.2. Understanding the clearance process	16
2.3. General process in customs clearance	17
2.3.1. Imports	17
2.3.2. Exports	18
2.3.3. Transit	19
3. FEES AND CHARGES BY CUSTOMS AND OTHER GOVERNMENT AGENCIES INVOLVED IN TRADE.....	20
3.1. Ministry of Industry and Commerce- MIC	20
3.2. Mozambique Revenue Authority- AT/Customs	20
3.3. National Directorate of Veterinary Services- DNSV	21
3.4. National directorate of agricultural services- DNSA	23
3.5. National directorate of pharmacy- DNF	25
3.6. National forestry directorate	26
3.7. National institute of fish inspection- INIP	27
3.8. Ministry of home affairs- MINT	28
3.9. Ministry of Economy and Finance- MEF	28
4. FEES AND CHARGES BY PRIVATE SECTOR ACTORS INVOLVED IN TRADE	29
4.1. Confederation of business associations- CTA	29
4.2. Mozambique community network- MCNET	30
4.3. Non-intrusive inspection- NII	31

4.4.	Intertek- pre-shipment inspection- PSI	33
4.5.	The Chamber of Customs Brokers of Mozambique (CDA) and Transit Operators	34
5.	DISCUSSION OF FINDINGS.....	34
6.	REFERENCES.....	38
	ANEXES	41
	Annex I— Inventory of fees and charges relevant to clearance of goods	41

LIST OF TABLES

Table 1: Description of public institutions and trade related services	14
Table 2: Public institutions and the legal basis for fees applied to trade related services.....	15
Table 3: Customs declarations under the new customs clearance decree	16
Table 4: Fees associated with the use of the SW platform	31
Table 5: Fees associated with the use of NII services.....	32

LIST OF FIGURES

Figure 1: Import process flow chart.....	18
Figure 2: Export process flow chart.....	19

EXECUTIVE SUMMARY

Mozambique ratified the World Trade Organization's Trade Facilitation Agreement (WTO TFA) in June 2017. As part of its efforts to implement the agreement, an analysis of its compliance with Article 6—Disciplines on Fees and Charges in Connection with Importation and Exportation was requested. Article 6 has two main commitments—publishing all fees and charges for purposes of transparency, and ensuring that fees do not exceed the costs of services in clearing imports and exports.

The scope of this study covers trade related services in connection with clearing imports and exports. It also includes transit, which has specific commitments under the TFA's Article 11. The most relevant commitment for transit is that goods transiting through Mozambique should not be subject to fees and border management formalities.

Through field observations at ports of entry/exit and through stakeholder interviews our analysis found that Mozambique could improve its fees and charges disciplines, particularly:

- Fees should be set according to the cost of service rendered. For example, the customs processing fee is determined by the type of declaration used, which is dictated by the value of the good.
- Fees for revenue generation should be reviewed and eliminated or restructured. Some fees appear to be imposed for revenue generation as a certain percentage of fees are intended to be returned to the national treasury.
- Periodic reviews to reduce the number of fees should be done systematically. Some fees have not been reviewed in over 10 years.
- Transit goods are subject to fees and formalities. Goods transiting through Mozambique must currently pay a customs processing fee and are subject to document reviews.

I. INTRODUCTION

I.1. CONTEXT

This study was conducted in the context of Mozambique's acceptance of the World Trade Organization (WTO) Trade Facilitation Agreement (TFA), especially in the light of the articles 6.1 and 6.2 on fees and charges imposed or relating to importation, exportation and penalties. The study was financed by USAID's Supporting the Policy Environment for Economic Development (SPEED+) project¹, and co-planned with the Mozambique National Trade Facilitation Committee (NTFC). The Mozambique Confederation of Business Associations (CTA), the Mozambique Revenue Authority (AT) and the Ministry of Industry and Trade (MIC), who are equally members of the NTFC, played a pivotal role in providing inputs and facilitating stakeholder meetings.

I.2. OBJECTIVE AND APPROACH

The objectives of the study were: (i) to conduct a detailed analysis of the fees and charges imposed on imports and exports by Customs, other government agencies, and private companies providing clearance-related services; (ii) to conduct a comparative analysis with other countries in the Southern and Eastern Africa region; and (iii) to provide recommendations on possible negotiations of contracts with private companies. The main body of the report covers the first objective.

The study was undertaken by conducting a document review, interviews with stakeholders and validation meetings at national and subnational level, and visits to two ports (Ressano Garcia in Maputo province and Beira in Sofala province).

I.3. SCOPE

The study is framed around the articles 6.1 and 6.2 of the WTO TFA. Article 6.1, which outline the disciplines for imposing fees and other charges on imports and exports. This includes: 1) publishing information about such fees or charges, and when and how payment is to be made; 2) informing the trading community about fees and charges before they enter into force; 3) periodically reviewing fees with the intent of reducing them; and 4) limiting fees to the cost of services rendered. These articles of the TFA also reinforce the General Agreement on Tariffs and Trade (GATT), whereby fees should not represent an indirect protection to domestic products, and should not be imposed for fiscal purposes.

Article 6.2 is concerned with fees and charges for customs processing. It provides that fees and charges: "shall be limited in amount to the approximate cost of the services rendered on or in connection with the specific import or export operation in question; and are not required to be linked to a specific import or export operation provided they are levied for services that are closely connected to the customs processing of goods."

The fees and charges analyzed include not only charges paid to the customs authority, but also to other public authorities or private companies involved in the clearance of imports, exports or goods in transit, such as inspections (document, physical, non-intrusive), electronic single window (SW),

¹ This is a USAID funded project in Mozambique that provides expertise to the Government of Mozambique (GoM) to support economic and structural reform in the areas of agriculture, trade, business enabling environment, energy, water and biodiversity conservation. Equally, the project support areas of improved fiscal transparency, tax policy and economic and environmental governance.

licensing and certification, document management, quarantine, sanitation and fumigation. The study does not include assessment of fees and charges associated with logistics, parking terminal lot, and terminal fees as they are not directly related to customs clearance process.

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The fees and charges analyzed include not only charges paid to the customs authority, but also to other public authorities or private companies involved in the clearance of imports, exports or goods in transit, such as inspections (document, physical, non-intrusive), electronic single window (SW), licensing and certification, document management, quarantine, sanitation and fumigation. The study does not include assessment of fees and charges associated with logistics, parking terminal lot, and terminal fees as they are not directly related to customs clearance process.

I.4. STRUCTURE OF THE REPORT

The report is structured around the government authorities and private sector actors involved in clearing goods at Mozambique’s ports of entry, with an annex listing the fees and charges for issuing required licenses, certificates, and permits prior to importing and exporting.

2. RELEVANT BACKGROUND INFORMATION

2.1. UNDERSTANDING THE CONTEXT OF FEES AND CHARGES FOR TRADE RELATED SERVICES

2.1.1. PUBLIC INSTITUTIONS

The GoM of Mozambique defines a fee as a compulsory payment in exchange for a fundamental public service offered by the state, given that no private entity is authorized or licensed to render such a service, unless otherwise legally provided². Public authorities charge a variety of fees for government services including fees for trade related services

The GoM has raised serious concerns over the use of funds generated for government services by various public entities, especially in terms of transparency and control and management, given that these are managed outside state budget (*off-budget*).

The Ministry of Economy and Finance (MEF- formerly Ministry of Finance) 2010 directive³ provided the concepts and procedures relating to collection, accounting and integration of the funds into state budget. A study by the Division of Planning, Research and International Cooperation within the Tax Authority points out that through the 2010 directive, MEF seeks to better control funds and to increase the level of revenue collection and state budget financing⁴.

The effectiveness of this directive is mixed⁵. Some public institutions do not remit collected funds to the treasury; partly because of the absence of a legal force that makes the transparent management and the remittance mandatory. Presently, there is a general consensus within the MEF that there should be more clarity in terms of how these funds are managed. Additionally, there is a broad understanding that the current directive should be elevated to a Ministerial Diploma, which would provide the MEF with the basis for holding public institutions accountable while securing effective and transparent management of the funds, including remittance to the treasury.

The customs agency, which is under MEF's authority, is the key actor in providing trade-related services at the border. Customs works jointly with other agencies to determine whether goods can be cleared for import and export. Some of the other border management agencies include: the Ministry of Agriculture and Food Security (MASA), Ministry of Health (MISAU), Ministry of Land, Environment and Rural Development (MITADER), Ministry of Sea, Inland Waters and Fisheries (MIMAIP), and the Ministry of Home Affairs (MINT). The table below summarizes the relevant services provided, and the legal instrument dictating the fees charged in connection with the trade-related services.

² Circular no 01/GAB-MF/2010 (Ministry of Finance Directive).

³ Idem.

⁴ AT/Gabinete de Planeamento, Estudos e Cooperação Internacional (2016). Reflexão sobre receitas próprias e consignadas.

⁵ The assessment of the effectiveness of the directive is contained in the minutes of a meeting in November 15th 2017. The minutes were drafted on behalf of the Research, Planning and International Cooperation unit of the AT and the meeting was attended by public officials from relevant public institutions.

Table 1: Description of public institutions and trade related services

ID	Institutions	Title of trade services provided	Relevant legal instruments for fees charged for trade services
1	Customs	Release and clearance of goods for import and export, as well as other trade regimes.	Decree 34/2009 of 6th June Ministerial Diploma 11/2013 of 8th August
		Transit processing	Ministerial Diploma 25/2012 of 12 March Service Order 008/DGA/2013
2	Ministry of Agriculture and Food Security (MASA)	Animal health services	Ministerial Diploma 9/2007 of 31st January and Decree 26/2009 of 17th August
		Plant health services	Decree 5/2009 of 1st of June
		Pesticides services	Decree 6/2009 of 31st March
3	Ministry of Health (MISAU)	Drug and medicine services	Ministerial Diploma 125/2008 of 31st December
4	Ministry of Land, Environment and Rural Development (MITADER)	Forestry services	Decree 42/2017 of 10th of August
5	Ministry of Sea, Inland Waters and Fisheries (MIMAIP)	Fisheries and animal feed services	Ministerial Diploma 22/2004 of 2nd June
6	Ministry of Home Affairs (MINT)	Firearms and ammunition services	Decree 8/2007 of 30th April

To comply with the WTO TFA's Article 6, a country must publish information on fees and charges, periodically review the fees with the intent of reducing them, and limit fees to the cost of the service rendered. In Mozambique, information on trade-related fees are accessible through the customs (AT) website and the Mozambique Community Network (MCNet) websites. The websites provide relevant information on trade procedures (import, export and transit operations).

With regards to periodic reviews, some agencies have been charging the same fees for nearly ten years, with the exception of customs and forestry, which were updated in 2017. Table 2 provides the years fees were last reviewed by each agency.

Table 2: Public institutions and the legal basis for fees applied to trade related services

Trade related services	Latest approval of fees	Previous review (year)	
Customs clearance	2017	2009	2002
Animal health	2007	No information on previous fees	No information on previous fees
Plant health	2009	No information on previous fees	
Pesticides	2009	No information on previous fees	
Pharmaceuticals	2008	2000	No information on previous fees
Forestry	2017	2011	No information on previous fees
Fisheries and animal feeds	2004	— No information on previous fees	
Firearms and ammunitions	2007	— No information on previous fees	

Generally, fees are proposed by the concerned institutions and agreed upon by the MEF, but there are specifics with regard to forestry services. Fees charged are reviewed every three months, and are established based on timber market value (further elaborated on under MITADER). INIP is also currently coordinating with MEF a review process of its fees. There is a general agreement that the next set of fees charged for services (e.g. lab testing, market price of lab reagents, equipment, etc.) should be associated with the actual costs of inputs, which will likely push fees upwards. With the exception of these efforts, generally, public institutions find it challenging to provide the rational or methodology for how fees are calculated. Lastly, it is questionable whether some of the fees charged are used for revenue purposes as a percentage of some fees are meant to be sent to Treasury. (See discussion under MEF).

2.1.2. PRIVATE COMPANIES

A number of private companies participating in customs clearance are identified in the report (see *chapter 4 for further details*). The main ones include the Mozambique Community Network (MCNET), which serves as the national single window (SW) for trade; Kudumba Lda in charge of non-intrusive inspection (NII) services. Other private entities relevant to trade but not directly involved in

clearance include Intertek Mozambique, which conducts Pre-shipment inspection services (PSI) at origin; the Chamber of Custom Brokers of Mozambique (CDA); and the Confederation of Business Association (CTA).

Fees charged for SW and NII services are published in ministerial diplomas; Ministerial Diploma 25/2012 of 12 March for SW services, and the Ministerial Diploma 77/2007 of 4 July for NII services. In both cases, fees are charged in foreign currency (United States Dollar- US\$), and users pay the equivalent in Mozambique currency (Meticais-MT).

Since its approval by MEF (in 2012 for SW services and in 2007 for NII services), these fees have not changed. The principal reason behind these established fees is the need to recover the costs of investments over of the concession period. In relation to PSI services, the GoM pays all the fees, except for the importation of used vehicles, which is paid by the importer at port of origin at a fixed fee.

2.2. UNDERSTANDING THE CLEARANCE PROCESS

Customs clearance consists of customs and other regulatory actors conducting procedural and documentary requirements to process goods moving through the country under a specific trade regime, such as import, export and transit. In practical terms it can entail obtaining licenses, declaring goods through a customs declaration form, applying trade security procedures (e.g. risk management, scanning), and releasing and clearing the good for import, export or transit.

Mozambique’s rules for customs clearance were recently reviewed and updated, and are provided under Decree No 9/2017 of April 6, 2017.

Despite the April 2017 date for entry into force, at the time of fieldwork for this study (which occurred at the Ressano Garcia Border and Beira port in late 2017), there was evidence that customs officials were still applying the old decree- (34/2009 of July 6), especially in relation to fees charged for customs processing (or Taxa de Serviços Aduaneiros- TSA). The main reason behind this is the pending regulations that have to be adopted under the new decree.

The new decree provides three types of declaration forms- Single Document (DU); Abbreviated Document (DUA); and Simplified Document (DUS). A brief description of the differences between these types of customs declarations are provided below.

Table 3: Customs declarations under the new customs clearance decree

Customs declaration	Key features
Single Document- DU	The normal form of customs declaration for shipments over US\$1,000. It requires a customs broker for clearance.
Abbreviated Document- DUA	A customs declaration for reduced value and quantity of goods, and mainly for commercial purpose not exceeding US\$ 1,000. It requires customs brokers for clearance.
Simplified Document – DUS	Usually used for import and export of goods, values separated from luggage brought by travellers in excess of

Customs declaration	Key features
	their franchise set at USD 500. Does not require a customs broker for clearance purpose.

The new decree has different customs service fees depending on the type of customs declarations and trade regime. Previously all declarations and regimes had a single rate for goods entering with a DU and DUA, as well as goods that were exempt from duties. The specific operations of transit regime are regulated by the Ministerial Diploma 113/2013 of 8th of August and the description of transit operation is presented in section 2.3.3

2.3. GENERAL PROCESS IN CUSTOMS CLEARANCE

This section describes the clearance process applicable to customs declarations under DU and DUA as well as goods in transit. The description does not relate to a clearance of a specific good/cargo nor to a specific means of transport, but rather to the general process with the usual public and private actors involved in clearance process. The description does not take into account situations where delays may occur because of lack of trader compliance, physical inspections, the need to validate or request for additional information.

2.3.1. IMPORTS

The decree 49/2004 of 17th November provides that all importers must be licensed. The license is issued by the Ministry of Industry and Commerce (MIC), through its provincial representations- the Provincial Directorate of Industry and Commerce (DPIC). The license is issued for a specific type of goods that the trader is legally entitled to import, and it is renewed every five years.

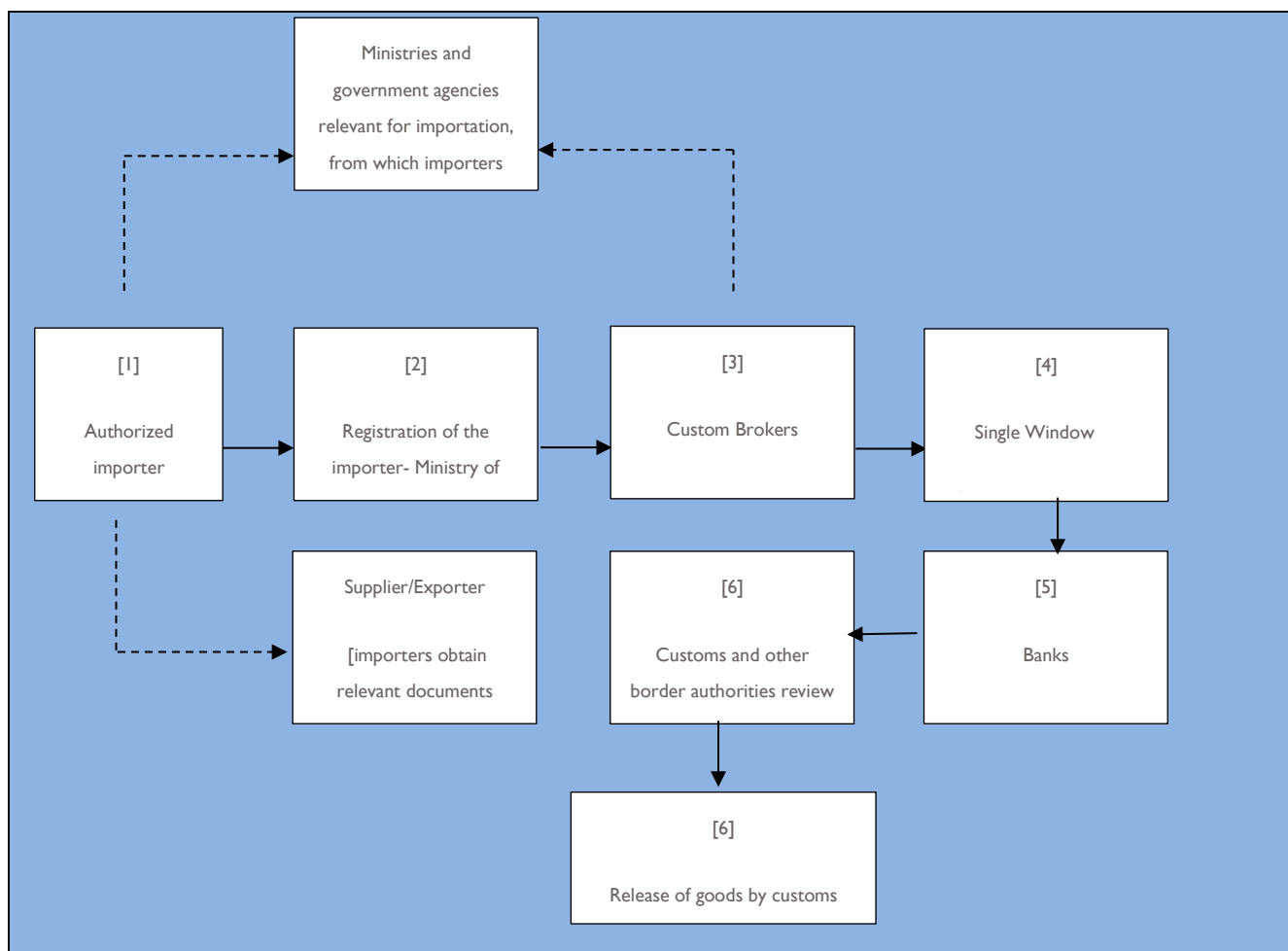
If goods require a Pre-Shipment Inspection (PSI), this will be conducted at the country of origin at the request of Intertek Mozambique. Upon PSI of the goods, Intertek issues a Single Certified Document (DUC) confirming conformity of the goods. *(A more detailed account of Intertek’s role in customs clearance is provided in section 4.4.)* The importer must also obtain from the exporter/supplier other documents that are required depending on the type of good (e.g. health and conformity certificates). The importer receives these documents, including the commercial invoice after goods have been dispatched.

Upon receiving the documents, the importer initiates the clearance process. The Mozambique legal framework on customs clearance⁶ distinguishes normal clearance from pre-clearance. The former, is conducted upon arrival of the goods, while the latter takes place before arrival of the goods.

In both for normal and pre-clearance, the importer is required to engage a customs broker. *(The role and duties of customs brokers in the clearance process is described in section 4.5)*. Upon the arrival of the goods, the customs broker begins the processing of documents the SW, including the payment of duties. After duties are paid, goods are scanned and undergo a customs selectivity process. At this point goods may be selected for physical inspection/verification by customs and other relevant agencies. The following flowchart presents the general process for import of goods.

⁶ Decree Nr 34/2009 of 6 July and Decree Nr 9/2017 of 6 April

Figure 1: Import process flow chart



Source: Adapted by the authors

2.3.2. EXPORTS

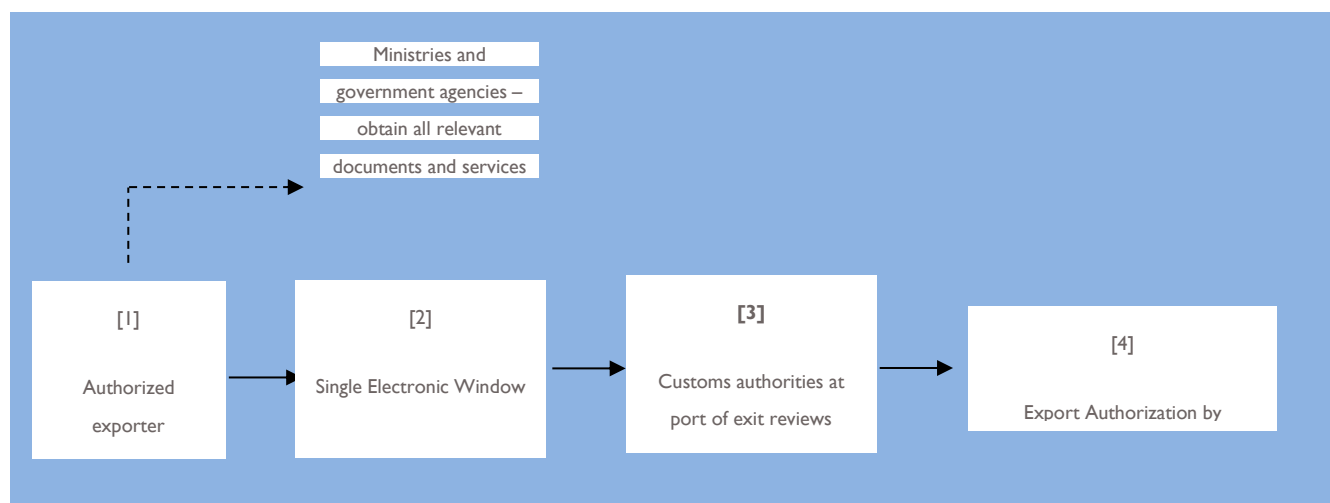
Similar to imports, an exporter must be licensed with the MIC under Decree 49/2004 of 17th November. The MIC issues the license through DPIC. The license is issued for a specific type of goods that the exporter is legally entitled to export, and the license is renewed every five years. Some goods may require that PSI be carried out, and this is conducted by Intertek Mozambique at the request of the importing country. Intertek inspects the goods and issues a DUC indicating goods conform with the specification indicated by the importer.

When the exporter receives a proof of payment from the importer, and where applicable, the exporter seeks to obtain the Certificate of Origin from customs (this applies to goods exported within the Southern Africa Development Community Region- SADC or to an African-Caribbean and Pacific- ACP country that has an agreement with Mozambique).

The exporter will also collect other relevant documents (inspection, phytosanitary certificates, quality certificate, export authorization, etc.) from line ministries and other agencies. Fees are charges for the issuance of these documents, and further elaborated on under each line ministry below. A clearing agent (customs broker) must then be contracted to initiate the clearance process. The clearing process involves paperwork processing, customs and other line ministries supervising

the packaging of goods before goods are sealed (for containerized cargo), scanning and the issuance of an export authorization by customs.

Figure 2: Export process flow chart



Source: Adapted by the authors

2.3.3. TRANSIT

Any person intending to conduct transit operations, such as a forwarding agent, transporter, and warehouse operator must be licensed under the Ministry of Transport and Communication (MTC), and registered with customs. Goods in transit⁷ are subject to customs control, both during entry and exit. For entry, goods are declared by the forwarding agent through its customs broker. The documents submitted to customs includes the transit customs declaration and documents relating to cargo and the mode of transport. These documents can be submitted to customs prior to arrival or upon cargo's arrival.

For transshipment, the customs broker requests clearance from customs authorities detailing the motives for transshipment, place, date, time, information on the mode of transport the transshipment will take place and destination. Trans-shipment takes place after approval is granted by customs. The maximum permitted period for goods to stay in transit is 6 days, which can be extended to 30 days upon approval by the Customs General Director.

A fiscal guarantee is paid to ensure control and non-violation of the cargo. Some goods are exempted from lodging a fiscal guarantee⁸. The value of the fiscal guarantee is 35% of the total value of the customs duties and other charges. The payment of the fiscal guarantee takes place at the time of clearance through a customs declaration (DU). The guarantee is cancelled upon clearance at the port of exit and should be refunded within 10 working days.

⁷ Priority in transit operations is given to live animals, newspaper and magazines, medicine, hazardous materials, perishable goods or goods that deteriorate rapidly.

⁸ Ministerial Diploma Nr. 116/2013 on Customs Transit Regulation

Fees paid to the border management authorities during the import, export, and transit process are noted below under each agency involved.

3. FEES AND CHARGES BY CUSTOMS AND OTHER GOVERNMENT AGENCIES INVOLVED IN TRADE

3.1. MINISTRY OF INDUSTRY AND COMMERCE- MIC

MIC is the institution responsible for the development and implementation of sectoral policies and strategies designed to promote growth of the industrial production, trade, agricultural marketing and exports. It provides trade policy guidance, and support Mozambique's adherence to the World Trade Organization Trade Facilitation Agreement (WTO TFA).

MIC is not involved in the clearance process at the ports, but it is responsible for registering all traders as "Foreign-Trade Operators." The Ministerial Diploma No 202/98 of 12 November establishes the norms and regulations for registration as traders. To register one must pay 1,000 MT of subscription fee and 250 MT for the issuance of a registration card. For imports, renewal is annually, whereas for export the renewal coincides with the period of renewal of the company's license. The registration fee for exporters is similar to that of importers.

3.2. MOZAMBIQUE REVENUE AUTHORITY- AT/CUSTOMS

AT is made of various divisions- customs; taxation; common services; internal control and international planning and research. Customs is responsible for implementing customs legislation and regulations relating to import, export, storage of goods, values, and collection of duties and taxes. Customs plays a leading role in the clearance process of goods at ports of entry and exit, and charges a TSA fee for imports, exports, and transit. Under the new decree on customs clearance, the amount of the TSA fee varies depending on the customs declaration used, which include:

- Single Document (DU) - a normal customs declaration of goods, used for values over US\$ 1,000, and with any means of transportation (air, rail, road and maritime) entering and leaving the country irrespective of the regime (e.g. import, export, transit);
- Abbreviated Document (DUA) — a customs declaration for reduced value (up to US\$ 1,000), used mainly for commercial trade; and
- Simplified Document (DS) — a form of customs declaration usually used for values separated from luggage brought by travelers in excess of their franchise set at US\$ 500, destined for personal use, and with no commercial purpose.

To better understand the application of the TSA, it's important to understand the distinction between two major customs regimes – general and special (according to the newly approved Decree No 9/2017 of 6th April). The general regime includes imports and exports on DU, DUA and DS. The special regime on the other hand, is for temporary imports and exports, reimported and re-exported goods, transits, transfers, warehoused goods, duty-free shops, free trade zones, cabotage, and especial economic zones. For the purpose of this study, we focus on the general regime (DU and DUA) and only the special regime as it relates to transit

IMPORTS. Customs charges a TSA as follows:

- Goods entering with a DU declaration form
 - *Goods exempt from duties: 1,500 MT*

- Goods subject to duties: 750 MT
- Goods entering with a DUA declaration form
 - Goods subject to duties: 500 MT
- Goods entering with a DS are charged a fee of 250 MT

Customs charges these fees to cover its services, which include document reviews, customs processing, and inspections. However, it is not clear whether the fee charged is aligned with the cost of the service. When customs was inquired about this, there did not seem to be a specific methodology used to determine the cost of service or how the fee was determined. This becomes apparent in the different amounts customs charges for duty exempted goods versus taxable goods, when the level of effort by customs does not differ, or in fact may be less for exempted goods since valuation is not considered.

As previously indicated, in late 2017 customs continued to apply the decree 34/2009 for clearance, **which provides a TSA fee of 2,500 MT on imports exempted from duties.**

EXPORTS. The new decree on customs clearance provides TSA on exports as follows:

- Goods with a DU declaration form: 750 MT
- Goods with a DUA declaration form: 250 MT

Similar to imports, the newly approved TSA fees on exports are not in force in ports visited. Both in Beira port and Ressano Garcia border continue to charge a TSA fee of 2,500 MT on exports under DU and DUA.

Unlike imports, customs involvement in clearance of exports is minimal. Generally, customs tasks are limited to document review and facilitating non-intrusive inspections. Physical examination of exports does not take place. Therefore, it is not clear why customs charges the same amount for commercial imports and exports, when services are more limited for exports.

During field observations, we noted different practices relating to non-intrusive inspections (NII). It was noted that the government had issued a directive obliging the performance of NII for all exports, however, the directive was poorly received by traders, who complained of delays in Beira Port. In response, the government reversed the decision. At the time of this report, Ressano border performs NII on all exports while the Port of Beira does not, though at both ports all exporters are paying for the cost of inspections.

TRANSIT. Goods in transit are subject to a document review and scanning. All transit goods must pay a customs processing fee per declaration. Physical inspection does not occur unless customs is aware of a risk or serious violation of transit rules. Other authorities - veterinary and agriculture- may equally intervene if risk is detected. The transit processing fee was recently updated to be 250 MT under Decree No 9/2017 1st of April. However, customs authorities at the ports have not yet updated these fees and continue to charge transit a TSA of 2,500 MT under the previous legal provision (Decree 34/2009 of 6th July on General Rules for Customs Clearance). Additionally, customs charge a transit fee of 50 MT for the use of country infrastructure such as port and roads.

3.3. NATIONAL DIRECTORATE OF VETERINARY SERVICES- DNSV

The DNSV is the veterinary authority under the Ministry of Agriculture and Food Security (MASA) responsible for ensuring the health of animal origin products by inspecting for hygiene and sanitary requirements. DNSV oversee at the national level. At the provincial level where most of the

operations (and inspections) take place, DNSV is represented by the Department of Provincial Veterinary Services (SPP). SPP is involved in the clearance process for both imports and exports, although there are practical differences between Beira Port and Ressano Garcia Border. Mainly, that at the Ressano Garcia border, SPP has permanent veterinary services personnel present, while at the Beira Port personnel are called on-demand. At the time of fieldwork, customs authorities indicated the absence of SPP personnel is mostly due to lack of infrastructure and this would be addressed soon.

IMPORTS. The regulation states that “no import of animal, its products, by-product, or biological products are allowed to enter the country unless an import license is issued by the veterinary authority”. Requesting an import license begins at the provincial level through an application at Provincial Veterinary Services (SPP). At national level, DNSV issues the import license based on a thorough risk assessment of the country of origin of the animals and related products. The risk assessment is based on the information regularly published by the World Animal Health Information Database (WAHID) and the World Organization for Animal Health (OIE). Then, the veterinary authority of the exporting country issues a veterinary international certificate, which should be reviewed by DNSV when goods arrive.

DNSV’s inspectors should be notified two weeks’ prior the arrival of the goods. Inspection has to take place before clearance at the port of entry. However, inspections may take place at the premises of the importer, such as the warehouse for meat products or corral for live animals, because the ports analyzed in this study do not have the required infrastructures.

Goods meant for public consumption will have samples taken for quality tests, but this procedure is not strictly enforced in Beira Port. The law provides that customs authorities “cannot proceed with the clearance of entry of animal and related products without presentation of specific import documentation and performance of inspection and approval by the veterinary authorities”⁹

In the case of live animals, they are isolated for quarantine. Infrastructure for quarantine are arranged by the importer given that government no longer has operational quarantine facilities in the country. If results of the tests are satisfactory, DNSV issues a Sanitary Certificate¹⁰; and in the event results are unsatisfactory, goods may be retained, quarantined or returned to the country of origin.

The description above represents the normal/legal procedure for import of animals and related products. A clear difference between Ressano Garcia and Beira is that in the latter, there are instances where SPP is not notified of the arrival of goods, and therefore, inspection may not be performed upon goods’ arrival. Both in Ressano Garcia and Beira, inspections do invariably take place at the warehouse of the importer.

In Beira there were reports of inspections taking place when containers were already open by the importer. This might be due to the lack of SPP’s permanent presence at the port premises; but also

⁹ Decree Nr 8/2004 of 1st of April that approves the Regulation on Animal Health

¹⁰ The Sanitary Certificate and other documents (DUC, insurance, invoice, bill lading, import license, international sanitary certificate) are integral part of documents required for authorization of clearance by customs officials

and perhaps most notably, importers naturally tend to bypass local institutions and communicate directly with the DNSV in Maputo for licensing and certification¹¹.

Basic tests are performed by the local Provincial Directorates of Agriculture and Food Security (DPASA). The complex ones are conducted in regional labs (reference labs) located in Maputo, Gaza and Manica under the Mozambique Institute of Agricultural Research (IIAM). The Faculty of Veterinary at the Eduardo Mondlane University is also reported to perform complex tests.

Major fees on imports include import licenses for live animals and products and by-products of animal origin¹² and import phytosanitary certificates. The fees range from 100 MT- 500MT per license, certificate or term of quarantine issued. Inspections are charged based on quantity of the product.

EXPORTS. Prior to exporting, the trader obtains the sanitary provisions from the importing country. The exporter then submits those provisions along with their request to DNSV for an international sanitary certificate through the SPP. DNSV undertakes the inspections of the goods and authorizes the issuance of International Sanitary Certificate. The fee for the International Sanitary Certificate ranges from 150 MT- 500 MT depending on the nature of goods to be exported. Wild species, pets and hunting trophies have relatively higher fees compared to other products.

Additionally, traders are also subject to payment of transportation costs when inspections are conducted at the trader's premises. The trader is responsible for notifying the inspectors when this is needed. If the inspectors are transported in state-owned vehicle, the trader incurs a charge of 2,1 MT per Kilometer (Km); when the vehicle is owned by the trader, the charge is 1,6 MT per Km. This applies to both imports and exports.

TRANSIT. SPP charges a fee of 150 MT for a transit license. SPP verifies relevant transit documentation such as import license (for country of destination) and sanitary certificate (country of origin) when notified by the importer or customs at the premises of the port, but SPP is not permanently present at Beira port. Goods are only inspected if they have been unsealed. There is no charge for this service.

3.4. NATIONAL DIRECTORATE OF AGRICULTURAL SERVICES- DNSA

The DNSA is part of the Ministry of Agriculture and Food Security (MASA) and is the central authority responsible for establishing sanitary and phytosanitary procedures to be observed by traded goods. MASA is involved at the ports of entry through its provincial branches - the Department of Plant Health. Its services include issuance of licenses and certificates, inspection of goods and their means of transportation under all trade regimes, warehouse fumigation, and lab testing. Fees are charged for each of these services under the import and export regime.

DNSA is equally involved in the clearance process of pesticides. It is the authority that secure management pesticides and ensure that this is conducted without prejudice to public health, animals and environment.

¹¹ DNSV is centrally located, and it is tasked with licensing and certification. Inspection is conducted locally through the SPP at provincial level

¹² This distinguish license for live animal and from license for products and by-products of animal origin. At same time for live animals the license distinguish animal in terms of species. Import licenses for pets and wild species have higher fees

IMPORTS. Phytosanitary measures to be observed on imports of specific products (e.g. pests, diseases, and nematodes) are legally established in a decree and relevant regulations¹³. For products that are not pre-defined in the regulations, DNSA requires a pest risk assessment (from the exporting country) before an import authorization is granted. Upon authorization, DNSA issues a phytosanitary import license. In the case of seed imports, a phytosanitary import license is authorized by the Seeds Department at MASA.

The process of requesting a phytosanitary import license begins at the Department of Plant Health. In turn, the DNSA's central office issues the phytosanitary import license against the international phytosanitary certificate issued by a competent authority from the country of origin, or the exporting country. Importers are required by law to notify the phytosanitary inspector from the port of entry two weeks in advance of arrival. Both at the port of Beira and Ressano Garcia, physical inspections take place at the premises of the ports. It is worth noting physical inspection on imports is widely applied in other ports in Mozambique.

Upon inspection, goods are either approved for clearance, tested, required to undergo SPS treatment, retained, quarantined, returned to the country of origin, or destroyed. When lab tests are required, samples are taken for tests outside the port. Generally, goods are cleared before lab test results are received. While the Department of Plant Health can perform basic tests, the most complex one are conducted laboratories under the IIAM, as described under section 3.4

Importers of pesticides must be registered with the MIC as traders and as an importer of pesticides with DNSA. An importer is granted "Certificado de Inscrição do Importador de Pesticidas" after DNSA has assessed warehousing conditions, capacity and qualifications of the personnel and the general pesticides handling conditions. The "Certificado de Inscrição do Importador de Pesticidas" is valid for one year, after which it has to be renewed. For renewal, the request should be submitted alongside the registration with MIC as trader.

Import request must be submitted to DNSA alongside the invoice. Import authorization is issued upon satisfactory assessment of the request. The import authorization is valid for three months from the date of issue, and it can be renewed for three months. Fifteen days upon import, the importer is required to notify DNSA on quantities, number of batches, date of manufacture and date of expiry. As part of the clearance process, these documents are verified/reviewed by DNSA officials stationed at ports.

EXPORTS. An exporter must submit a request of Export Certificate through the Department of Health Plant at the provincial level. The export certificate is then issued by the DNSA's central office. At least 14 days before the product is exported, the trader must notify the phytosanitary inspector at the port of exit, and at this point phytosanitary inspection is conducted at the trader's premises. An International Phytosanitary Certificate is then issued by DNSA based on the requirements from the importing country.

If the goods are containerized, customs must be present for the packaging and sealing of the container at the port of exit. Customs must be notified at least two days before the expected shipment date. Once the container has been sealed, the exporter files the customs declaration.

¹³ Decree No 5/2009 of 1st of June, which approves the regulation on Phytosanitary Inspection and Plant Quarantine

When exporting pesticides, the trader must be approved by DNSA. Prior to exporting, DNSA issues an export authorization.

TRANSIT. Transit goods are permitted when accompanied by import license of the importing country and a phytosanitary certificate of the exporting country. These supporting documents are reviewed by DNSA through the Department of Plant Health to assess potential risk of pest propagation. The review of the documents takes place before or at the arrival of goods. If goods are unsealed, this signals that there could be a breach of customs control, and the goods are then subject to mandatory inspection.

Often services of phytosanitary officials are limited to general verification of goods and documentation when a consignment has remained sealed and there are no evident risks. DNSA does not charge any fees associated with phytosanitary services for agricultural products in transit.

Pesticides in transit should have a legal representative in Mozambique for handling the transit requirements. The legal representative takes full responsibility for the period the pesticides stay in the country under a transit regime. The legal representative must submit a transit authorization/request to DNSA accompanied by a series of documents issued by the pesticides authority from the importing country approving the import. The issuance of transit license for pesticides is subject to a fee by DNSA and is in addition to the license required by MIC.

3.5. NATIONAL DIRECTORATE OF PHARMACY- DNF

The DNF under the Ministry of Health (MISAU) is responsible for registration of medicines, and the issuance of import license for pharmaceutical products. DNF ensures the quality, safety and effectiveness of medicines in the market. Other relevant institutions include the National Laboratory of Quality Control of Medicines (LNCQM), which is responsible for testing medicines; and the Central Drugs and Medical Supplies Procurement Service (CMAM), which is responsible for the purchase and supply of medicines and medical supplies used in the national health service. Additionally, there are the importers/distributors, who are legally established institutions (mostly private enterprises) that are tasked with importing and distributing medicines and pharmaceuticals products. In other instances, CMAM goes through private companies for the importation of medicines and pharmaceuticals products.

IMPORTS. Importers/distributors must register themselves and their products with the National Directorate of Pharmacy. There are fees charged in connection with the registrations and the issuance of import licenses. For each importation, traders must submit an import authorization request to the DNF, which then does a document review consisting of the invoice and a bulletin of imports of pharmaceutical specialties (i.e. a detailed list of all products to be imported — such as name of the product, features, characteristics and sale price to the public). In the review, DNF seeks to ensure there are no discrepancies between the content of the bulletin and the invoice. The DNF can then determine whether import approval should be granted by the Ministry of Health (MISAU)¹⁴.

While the authorization request is under way, the trader must also obtain documentation from the drug manufacturer from the exporting country to verify the legitimacy of the manufacturer, which includes a certificate of good practice in terms of production and handling of drugs (or international health certificate) and a manufacturing premises inspection report. In general, most of the

¹⁴ The approval is granted by the Minister of Health based on technical opinion issued by the DNF

manufacturers have legal representatives based in Mozambique and they are invariably the ones submitting these documents.

When import authorization is granted, the importer is required to provide to the DNF detailed information on the goods. This information may include — manufacturing date, date of shipment, and date of arrival. Upon arrival, the pharmaceutical products are subject to inspection, which may include lab testing. Generally, tests are done while the pharmaceutical products are stored and sealed at the trader's warehouse. (As of February 2018, Mozambique began testing pharmaceutical products from India before importation as part of a pilot program.¹⁵) Fees associated with imports of medicines and pharmaceutical products include: 1) importer/distributor 2) registration (renewable annually), 3) medicine registration, 4) import license, 5) registration certificate, 6) certificate of good practice, and 6) a fee for clinical trials to measure the effectiveness of the medicines.

EXPORTS. For exports, the National Directorate of Pharmacy issues a scientific review of the medicine to be exported as well as a certificate that the exporter is authorized to manufacture the medicine and complies with the Southern Africa Development Community (SADC) and the World Health Organization (WHO) norms of quality and handling of the products. Additionally, the National Directorate of Pharmacy issues a declaration confirming that the medicines to be exported are equally traded within the country. For exports, fees are only associated with the issuance of export licenses.

TRANSIT. The Directorate of Pharmacy is not involved with goods in transit unless when requested by customs to provide a special expertise. When this takes place, goods are not opened. In most cases, DNF contacts the drug authorities from the importing country to confirm the information on the goods in transit. DNF does not charge any fees relating to transit.

3.6. NATIONAL FORESTRY DIRECTORATE

The Ministry of Land, Environment and Rural Development (MITADER), through the National Forest Directorate is responsible for sustainable management of forests in Mozambique. DNF is involved in trade through the Provincial Forest and Wildlife Services (SPFFB), which is primarily involved in the trade of timber. The participation of SPFFB in trade is very much confined to exports.

It is worth noting that as of August 2017, Mozambique banned exports of all species of round timber¹⁶. The purpose was to discourage the export of raw timber, and encourage the emergence of a timber processing industry in the country to serve the local development agenda for poverty alleviation and employment generation, and also counter illegal logging.

IMPORTS. SPFFB is not involved in imports. The majority of timber imports are in the form of finished products that are regulated and cleared by customs.

EXPORTS. To export, a trader must submit an export authorization request to the National Forest Directorate, through the SPFFB. The export authorization is issued after a thorough legal assessment. This is then followed by a request to SPFFB for a phytosanitary inspection, which may

¹⁵ India is the major exporter of medicines and pharmaceutical products to Mozambique

¹⁶ Decree No 42/2017 of 10th of August

take place before goods arrive at the port of export. When this is concluded, customs can continue with its clearance process.

The trader must pay an export fee into MITADER's account which is managed centrally. The 2017 legislation defines that timber export fees be charged based on FOB market value of the processed timber¹⁷ based on a price reference sheet maintained by customs and reviewed about every three months. The amount of the fee is dependent on the type of good, for example: wood planks has a fee set at 30% of FOB; Boards at 15%; wooden sleepers at 15%; wooden bars 15%, and woody yard at 5%.

TRANSIT. Timber does not typically transit through Mozambique, therefore SPFFB is not involved.

3.7. NATIONAL INSTITUTE OF FISH INSPECTION- INIP

INIP is a public institution under the Ministry of Sea, Inland Water and Fisheries (MIMAIP). INIP participates in trade by issuing health licenses to ships and fish-handling enterprises, including all means of transportation, fisheries and aquaculture production facilities. INIP undertakes lab testing of fisheries and aquaculture products, issues health certificates and licenses fisheries activities. There are fees charged to perform these activities¹⁸. To undertake these activities, INIP relies on its provincial branches, equally referred as Provincial Delegations and five major labs located in Maputo, Beira, Quelimane, Nacala and Angoche. The labs perform key tests such as microbiology, chemistry and sensorial.

IMPORTS. An importer must submit an import request to the INIP. INIP reviews the request whether the goods originate from a place or zone declared free from diseases of aquatic animals, and if the means of transportation guarantee adequate protection to avoid contamination or other damages. Provisional Import Sanitary License is granted and the importer coordinates with the exporter. This license establishes the nature of tests the goods will be subject to, including the hygienic parameters to observe for a Health Sanitary Certificate by country of origin's competent authority. The INIP inspector must then be notified at least five days before goods arrive at the port of entry for an inspection to occur during the clearance process. The inspection is both document and physical. When lab testing is deemed necessary, the good will not be cleared until results are obtained, this includes quarantining live animals. After inspection, INIP issues a definitive Import Sanitary License.

INIP has agreements with countries such as Namibia and Angola from which major imports of fisheries come from. These agreements recognize testing/inspection services of fisheries undertaken by authorities from both countries, and because of this, there are no requirements for testing/inspecting of fisheries upon imports at the port of entry. Similar agreement exists with European Union (EU) countries.

EXPORTS. Assuming that a trader is licensed¹⁹ to operate a processing unit for export and has a sanitary license²⁰ for functioning as an exporting unit, the trader must then submit a request for an

¹⁷ It must be stressed this is FOB value and not a unit value

¹⁸ These fees have been undergoing review since late 2017, and new fees should be expected in 2018

¹⁹ The license is for an individual processing unit, which is renewed annually

²⁰ This is a specific license and recognizes the exporting units. It is renewed annually

Export Health Certificate to the INIP central office through its provincial offices. INIP reviews the request and this may involve verifying whether the request is from an authorized trader or production unit, and if it was manufactured from materials free from contamination. It is worth noting that the request for inspection is submitted at least one week before export of the products under category I to 5²¹ and six hours before for products under category 6²². Then INIP will carry out the inspection before an International Sanitary Certificate is issued. The inspection includes mandatory lab testing that include microbiology, chemical control and sensorial and these may vary depending on the type of species²³ to be exported but also depending on the complementary tests required by the importing country.

TRANSIT. INIP involvement in transit is limited to issuing a transit license and review of transit documentation. The transit license is issued before goods arrive. Goods are verified and further examination may be required if there are strong evidence of a safety and health breach. Customs may notify fishery authorities of the need for such an examination.

3.8. MINISTRY OF HOME AFFAIRS- MINT

One of the mandates of the MINT is to supervise the manufacturing, commercialization, licensing, and trade of arms, ammunitions and explosives.

IMPORTS. Imports of arms, ammunition and explosives is only possible through licensed firearm commercial stores. Therefore, individuals intending to import firearms must go through a licensed store. Stores must submit an import request to MINT, which then verifies the conformity of required documents before issuing a validation certificate and the import license. Charges associated with MINT charges import license fees, and a fee per import of firearm and ammunition.

EXPORTS. To export arms, ammunitions and explosives one must register with MINT as an exporter, and must request approval for each individual export. The period this should occur in advance is undefined. This includes submitting your exporter registration documentation, invoice, and bank transfer confirmation. MINT will then issue authorization and the trader (commercial store as stated above) can proceed to export. At the port of exit, MINT will examine the goods to verify the physical good with the documentation. The issuance of export authorization of firearms and ammunition is not subject to payment of fees.

TRANSIT. Information on firearms, ammunition and explosives transiting through Mozambique was not gathered.

3.9. MINISTRY OF ECONOMY AND FINANCE- MEF

The MEF is not directly involved in clearance process but it does so through with customs, which falls under its directive. MEF also plays a role in approving fees imposed on trade by other

²¹ Category I: Live bivalve mollusks, fresh or frozen; Category II: Pasteurized products, pre-cooked, smoked, breaded, marinated, frozen or not, that can be consumed with or without being cooked; Category III: Low-acid or acidified products, hermetically sealed, also termed as canneries; Category IV: Salted products, dried, smoked and cold; Category V: Frozen products

²² Crustaceans and live fish or fresh

²³ The species are categorized in four groups: 1- Crustaceans (surface water shrimps, lobster), including live bivalves; 2- Crustaceans (deep water shrimps, crabs and others); 3- Fish and cephalopod; 4- Dried, smoked and cured fish; and 5- Others

government agencies. Fees are set based on the agencies' recommendations. Many of the "Ministerial Diplomas" on fees and charges imposed on trade²⁴ are jointly enacted by the MEF and other ministries and agencies. Additionally, the fees collected in connection with the scope of these legal instruments are shared between the treasury (MEF) and the concerned ministry or agency. According to the various ministerial diplomas, the destination of fees collected should be as follows:

- Animal health services: 40% is channeled to the Agrarian Development Fund of Mozambique²⁵ (FDA), while 60% is transferred to the treasury;
- Phytosanitary services: 40% is directed towards the Ministry of Agriculture and Food Security (MASA) while 60% goes to treasury;
- Arms and ammunition services: 40% is channeled to the coffers of the Mozambique Police (PRM), while 60% goes to the treasury;
- Fish and feed services: 100% of the amount is channeled to INIP;
- Pesticides services: The Ministry of Agriculture receives 30%, the treasury receives 60%, and MITADER and MISAU receive 5% each.
- Drug registration: 60% remains at the DNF, and 40% is channeled to the treasury;
- Customs transit fee: from 50 MT charged per customs declaration 40% remains with customs and 60% goes to the treasury.

As described earlier, although there is no specific legal framework governing the mechanism of transferring these funds to the treasury. In 2010 the MEF through an executive order²⁶ established general procedures for its collection, use, and channeling to the state treasury. The process has been marked by failure of some ministries and agencies in transferring the funds to the treasury. The reason has been associated with the lack of a legal framework that obliges the ministries and agencies to do so. Also, because funds raised from these services are seen as an opportunity for ministries and agencies to address their financial requirements, there has been a tendency to not transfer funds collected in a predictable and sustained manner.

4. FEES AND CHARGES BY PRIVATE SECTOR ACTORS INVOLVED IN TRADE

4.1. CONFEDERATION OF BUSINESS ASSOCIATIONS- CTA

The CTA is one of the private sector representative organization working to contribute to private sector-led economic and social development in Mozambique by promoting regulatory reform. The

²⁴ This includes the Ministerial Diploma Nr 9/2007 of 31st January on veterinary services fees jointly enacted with the Ministry of Agriculture and Food Security- MASA (formerly Ministry of Agriculture); the Decree Nr 5/2009 of 1st June on Phytosanitary Inspection jointly enacted with MASA; the Ministerial Diploma Nr 22/2004 of 2nd June on fees for provision of fish and feed services jointly enacted with the Ministry of Sea, Fishery and Inland Waters-MIMAIP (formerly Ministry of Fisheries); the Decree Nr 6/2009 of 31st March on fees associated with pesticides services, jointly enacted with MASA; the Decree Nr 8/2007 of 30th April on fees associated with arms and ammunitions services jointly enacted with the Ministry of Home Affairs; and the Ministerial Diploma 125/2008 of 31st of December on drug services jointly enacted with the Ministry of Health (MISAU).

²⁵ A financial institution under the Ministry of Agriculture and Food Security (MASA) aimed to develop the agrarian sector in Mozambique. It promotes access to financial services for farmers and agrarian enterprises, foster partnerships between government institutions and other actors in the agricultural sector.

²⁶ Circular Nr 01/GAB-MEF/2010

organization is comprised of Sectoral Federations, Trade Chambers of Commerce and Business, and it has affiliates throughout the country. CTA members are traders, customs brokers. CTA is also 20 percent shareholder of Mozambique's national single window for foreign trade (MCNET). Members of CTA expressed concern with the following trade-related issues:

- Limited consultation on definition and setting of fees associated with services provided under public-private partnership agreements;
- NII charges not connected to services rendered;
- Border management inefficiencies due to limited progress on integrated border management (particularly at Ressano Garcia);
- Fees charged by agencies intervening in trade are still paid through multiple institutions
- Only INIP, Agency for Investment and Export Promotion (APIEX), DNSV and the Mozambique Institute for Cotton (**IAM**²⁷) were integrated into the SW. Further integration of additional agencies is needed to reduce time and cost of trade.
- Goods in transit require a high value fiscal guarantee.

4.2. MOZAMBIQUE COMMUNITY NETWORK- MCNET

MCNet is a public private partnership (PPP) responsible for designing and implementing the Electronic Single Window in Mozambique (SW). It was established in 2009 and has a 15-year concession agreement. The partnership breakdown is as follows:

- National government – 20 percent of shares;
- Mozambique's Confederation of Business Associations (CTA)- 20 percent of shares;
- Escopil-SGS consortium – 60 percent of shares.

The SW is the platform from which Mozambique Customs manages trade information submitted by traders (importers, exporters, and goods in transit²⁸) and it connects other stakeholders involved in the clearance process (clearing agents, terminals, ports and cargo storage, shipping agencies, freight forwarders, logistics companies; the central and commercial banks). SW provides services that include cargo tracking, arrival notices, payments, submission of electronic manifest and customs declarations, permits and license, but currently these functions are only available for a limited number of government agencies, which have been integrated to the platform. This includes INIP, Agency for Investment and Export Promotion (APIEX), DNSV/IAM (both within MASA). The effort to integrate additional agencies is ongoing and expected to include DNSA, MISAU, MITADER, and the Mozambique's Cashew Institute (INCAJU).

There are no direct payments made through the SW platform. The platform only generates reference number for each customs declarations submitted. Traders must still pay duties at the bank and provide the reference number so that the SW platform can track the process. The SW platform also generates licenses for those agencies that have been integrated. Payment for those licenses must still be made directly at the relevant agency.

MCNET charges fixed fees primarily to sustain the infrastructure, links, equipment, maintenance, power redundancy, training, and support. These fees are intended to offset the cost of services and

²⁷ Public institution responsible for the promotion of cotton production in Mozambique

²⁸ The mandatory use of the SW for goods in transit was made official through the customs order Nr 08/DGA/2013

the \$24 million investment made to construct the platform. The MCNet platform is currently used at 70 customs offices throughout the country.

The fees charged are summarized as follows:

Table 4: Fees associated with the use of the SW platform

Customs declaration, FOB values, in US\$				
Customs Regime	Less than 500 US\$	501-10,000 US\$	10,001-50,000 US\$	More than 50,000 US\$
Imports	5	24	64	0,85%
Exports	24	—		64
Transit/others ²⁹	24			

Source: Ministerial Diploma Nr. 25/2012 of 12 of March

For many years, traders have raised concern over the rational for the fees charged, but a particular emphasis has been given to the 0,85 percent charge for imports of 50,000 US\$ in FOB value. The MCNet argument is that this particular fee structure is intended to be fair, where high value traders are charged more than small consignments. Another concern is the need to integrate more agencies into the platform, along with payment functionalities.

MCNet fees were approved by the MEF (formerly Ministry of Finance). There are indications that before approval was given, Finance held a series of consultations with the public and private sector stakeholders. Recently, the GoM through the MEF has approached MCNet management about the need to charge fees in local currency versus USD.

4.3. NON-INTRUSIVE INSPECTION- NII

The Government of Mozambican (GoM) made the use of NII mandatory through a Decree No 10/2006 of 5th April. Kudumba Investments Lda³⁰ as part of the SGS network, provides the technology for non-intrusive inspection and equipment to scan the entry, exits and transit of goods. Kudumba is present in ports (Maputo, Beira and Nacala), airports (Maputo, Beira, Tete and Nampula), Maputo, Matola and Nacala Railways, and Ressano Garcia Border.

In Ressano Garcia border, there are two scanners- a mobile and fixed container scanner. The former for small vehicles while the latter is for larger vehicles (articulated ones). Generally, all cargo vehicles pass through the scanners with the exceptions of vehicles whose cargo is visible. Whether vehicles pass through the scanner or not, and irrespective of the trade regime, traders are charged a weight-based fee or a fee per container (as noted in Table 5).

Fees are set in USD and charged in Mozambique currency (meticaís) based on an indexed exchange rate. The indexation of the fee to dollar has been subject of complaints by the private sector given

²⁹ Order Nr 08/DGA/2013, issued by the Customs Authorities made the SW platform mandatory for transit trade

³⁰ The contract length is publicly unknown

that it is a cost incurred locally. Traders are also irritated that the exchange rate to be used is not communicated in advance. Fees associated with the use of NII are summarized in the table below³¹.

Table 5: Fees associated with the use of NII services

Description	Unit	Fee (US\$)
Import		
Container- Full	Per container	100,00
Container- Empty	Per container	7,50
Bulk cargo in totality and in parts including liquid cargo	Per container	1,70
Other bulk cargo	Per container	1,90
Minerals- in general	Per container	0,90
Cargo Vehicles up to 5 tons	Per vehicle	15,00
Cargo Vehicles between 5-15 tons	Per vehicle	50,00
Cargo Vehicles above 15 tons	Per vehicle	100,00
New vehicles	Per vehicle	50,00
Used vehicles	Per vehicle	30,00
Export		
Container- Full	Per container	50,00
Container- Empty	Per container	10,00
Bulk cargo in totality and in parts including liquid cargo	Per ton	0,75
Minerals- in general	Per ton	0,40
Used metals (scrap)	Per ton	1,90
Bulk sugar and bagged	Per ton	0,62
Citrus	Per ton	0,75
Cereals	Per ton	0,75
Others	Per ton	1,90

³¹ Fees charged for NII were approved by the Ministerial Diploma Nr. 77/2007 of 4th July

Description	Unit	Fee (US\$)
Transit		
Container- Full	Per container	25,00
Container- Empty	Per container	10,00
Vehicles	Per vehicle	15,00
Steel	Per ton	0,60
Bulk chrome	Per ton	0,75
Bulk cargo in totality and in parts including liquid cargo	Per ton	0,75
Minerals- general	Per ton	0,75
Coal and magnetite	Per ton	0,20
Sugar	Per ton	0,75
Others	Per ton	0,90
Airports		
Air passengers- Regional flights (SADC)	Per flight	10,00
Air passengers- Domestic flights (Mozambique)	Per flight	4,00
Air passengers- International	Per flight	10,00
Air cargo	Kilogram	0,25

Both in Beira Port and Ressano Garcia border, 100% of import goods are subject to document inspection, non-intrusive and physical inspection.

All exports are also subject to scanning and are being charged a scanning fee, although, not all containers are in fact being scanned. This is another irritant for traders who are being charged for a service that is not conducted. NII's justification for this charge is that they are present at the border providing more services than just scanning, for example surveillance. The cost of those services are offset by the fee charged on containers irrespective of whether they are scanned or not.

4.4. INTERTEK- PRE-SHIPMENT INSPECTION- PSI

Since 1998 the government of Mozambique has appointed Intertek to carry out PSI. Intertek conducts PSII on imported goods considered to be high risk, which are listed under Ministerial Diploma Nr 19/2003 of 19th February. The list is updated quarterly by the Customs Authorities, with the view of progressively reducing the number of goods subject to PSI. Around 10-12% of goods imported to Mozambique are currently subject to PSI. The government's rationale behind PSI

is twofold — (i) ensure that prices of imported goods are not under declared and with it, the government do not lose revenues; and (ii) make sure that imported goods do not pose safety risks to the country.

The GoM pays all the PSI fees, except for the importation of used vehicles, which is paid by the exporter at port of origin at a fixed fee of USD \$265. Intertek is present at the ports and is only involved in clearance if customs seeks its help on valuation issues. Intertek is mostly involved in post-clearance valuation audits.

Since 2017, PSI has entered a 5-years phase out period, during which technical assistance will be provided to key government institutions to take over much of PSI related activities and services. Intertek has personnel deployed at all port of entry, and a number of testing labs across the country³².

4.5. THE CHAMBER OF CUSTOMS BROKERS OF MOZAMBIQUE (CDA) AND TRANSIT OPERATORS

The Law Nr 4/2011 of 11th January establishes the CDA as that the entity responsible for regulating Customs Brokers in Mozambique³³. The use of customs brokers is currently mandatory in Mozambique. The fees associated with their services are not clearly regulated. Article 26 of the Decree Nr 16/2011 of 26th of May states that “in setting the service fees, the customs brokers should conduct with moderation, taking into account the time spent and the complexity of the services rendered as well as the value of the goods cleared”.

An established and objective mechanism of defining fees associated with services rendered by customs brokers is not evident. Fees are generally defined as percentage (%) of a good’s CIF value per customs declaration, and the percentage may vary across customs brokers. CDA indicated that customs brokers charge up to 10 percent of the FOB value, although there were also indications at the ports that the fee can be closer to one percent of FOB value for imported goods. Similarly, for transit, brokers/freight forwarders’ fees are based on negotiations with clients and are said to range between 50-150 US\$ for each customs declaration.

The absence of a clear mechanism for fees charged by customs brokers has led to increased complaints by traders, especially the “Mukheristas³⁴” who are concerned with being over-charged.

5. DISCUSSION OF FINDINGS

In the previous chapters (III and IV), we presented fees and charges for services rendered by government agencies and private companies in connection with trade. We noted that in conducting cross-border trade, traders pay for a range of services provided by both government agencies and private companies³⁵.

In this chapter we discuss the findings of the study based on the study framework provided under section 1.2. The discussion focusses on the following items: 1) Publishing information about such fees

³² Intertek conducts testing of all imported fuel to the country, has agriculture lab in Beira; and a coal lab in Tete

³³ Decree Nr 16/2011, of 26th May

³⁴ Mozambique Association of Informal Small Cross-Border Importers

³⁵ Mandated by the GoM under different business arrangements

or charges and payment mode; 2) Communication to trading community about fees and charges before they enter into force; 3) Regularity of review of fees with the intent of reducing them; 4) The relationship between fees and the cost of services rendered; 5) Customs processing fees and charges and its relationship with the cost of the services rendered; 6) Freedom of transit per the TFA, and 7) some general observations made on operational matters.

GENERAL DISCIPLINE

Publishing information about such fees or charges and payment mode

- The WTO TFA establishes that “information on fees and charges shall be published in accordance with the article I; and this information shall include fees and charges that will be applied, the reason for such fees and charges, the responsible authority and when the payment is to be done”
- Various government institutions involved in trade have no information published
- AT and MCNet are relatively organized in terms of information on trade that relates to the tariff book, description of trading procedures, and legal instruments. The webpages provide an inquiry point as well. However, there is not a consolidated list of fees for trade services. Information on fees is currently found across different legal instruments published on the websites of AT and MCNet.

Communication to trading community about fees and charges before they enter into force

- Communication with stakeholders prior to establishing a fee is not a systematic practice.

Regularity of review of fees with the intent of reducing them

- No pattern of a regular review of fees (See Table 2.)
- Some fees were established more than 10 years ago and have not been reviewed since.

The relationship between fees and the cost of services rendered

- Difficult to establish the relationship between fees charged and services rendered. Generally, no specific pricing principle could be identified across public institutions. However, in the case of INIP, there is current debate on how best to establish fees for services.
- Although private institutions (NII and SW services) indicated having an established principle and rationale for fees in force, this could not be verified during the interviews and data collection process.
- MCNet has fees that are mostly fixed values, however imports over FOB US \$50,000 have a percentage-based fee and exports valued between US \$500-\$49,000 do not have a fee. MCNET services (declaration filing, licenses, and permits) are the

same regardless of the value of the good, and therefore, fees do not seem aligned with the cost of service.

- In the case of NII, exports are being charged for scanning when goods are not being scanned.
- Full container imports are charged more than exports and transit when the level of effort for scanning is the same or should be very similar.
- Many of the fees collected have a fiscal dimension (see distribution of collected fees above under MEF) with funds channeled to the treasury.

Transparency in the definition and setting of fees

- Generally, fees are not published by individual institutions (with the exception of MCNet and AT)
- Private sector has complained about the secrecy in the definition of fees charged by private companies (scanning and port terminal operators). These fees are approved by the Ministry of Economy and Finance based on a proposals and negotiations with the vendors.

SPECIFIC DISCIPLINE

Customs processing fees and charges and its relationship with the cost of the services rendered

- A new customs processing fee was approved (Decree 9/2017 of 6th April), and provides differentiated customs processing depending on the type of declaration used (ranges from 100-1,500 MT). The type of declaration used is dictated by the value of the goods, therefore, it is difficult to understand the correlation of the customs' processing fee with the service provided.
- Customs processing fees under the old Decree (Decree 34/2009 of 6th July) continued to be used. For example, goods exempt from duties continue to be charged a customs processing fee of 2,500 MT, which is irrespective of the cost of service provided.

FREEDOM OF TRANSIT

Article 6 focuses on customs clearance fees for imports. Similarly, Article 11, which focuses on goods in transit, also limits fees and charges to the cost of the service and notes that fees should only apply to transportation and administrative procedures. It also notes that transit should not undergo formalities other than the identification of the good.

Relevant TFA articles: Transit charges, regulations, and formalities

11.1 -11.3 Formalities: regulations and formalities on transit shall be eliminated if not required or if there is a less trade-restrictive solution. Fees and charges should be limited to transit administrative procedures and limited to the cost of the service.

Transit, procedures and controls

11.5-11.10 Procedures & Controls: when controlling and processing transit movements, members shall allow pre-arrival declaration, and not apply formalities (documentation, controls, customs charges, and inspections) other than those needed to identify the goods. Members shall not apply technical regulations and conformity assessment procedures on goods in transit.

Currently, some of Mozambique's transit practices are not in line with the TFA commitment, as noted here:

- Customs is charging a processing fee for transit goods
- SPP and DNF charge a transit license and verifies relevant transit documentation such as the import license (for country of destination) and sanitary certificates.

Operational Observations

- Some government agencies allow for goods to clear at the port of entry while awaiting lab result, such as DNSA, while other agencies (INIP and DNSV) will wait for lab results to be returned before approving clearance.
- There are three types of inspections occurring for all imported goods at some borders – document, physical and non-intrusive scanning. Reducing the type of inspections through a robust risk management system would contribute significantly to lower trade time and costs.
- The national single window (MCNet) incorporates a limited number of government agencies. Traders must still request licenses and certificates and make payments through each individual agency.

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ANEXES

ANNEX I— INVENTORY OF FEES AND CHARGES RELEVANT TO CLEARANCE OF GOODS

MDA	Revenue Item	Approved Rates (MZN unless otherwise marked)	Payment Stage in the Clearance Process		
			Before	During	After
Ministry of Industry and Commerce- National Directorate of Trade	Subscription fee for Foreign Trade Operator	1,000	Yes	-	-
Ministry of Industry and Commerce- National Directorate of Trade	Issuance of Foreign Trade Operator Card	250	Yes	-	-
Mozambique Revenue Authority- Customs	Customs Service fees on import on DU-exempted from duties	1,500	-	yes	-
Mozambique Revenue Authority- Customs	Customs Service fees on import on a DU non-exempted from duties	750	-	yes	-
Mozambique Revenue Authority- Customs	Customs Service fees on import on a DUA	50	-	yes	-
Mozambique Revenue Authority- Customs	Customs Service fees on export on DU	750	-	yes	-
Mozambique Revenue Authority- Customs	Customs Service fees on export on DUA	250	-	yes	-
Mozambique Revenue Authority- Customs	Customs Service and Transit fee	50	-	yes	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Import License- Horses and Donkeys	150	Yes	-	-

Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Import License- Bovines	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Import License- Swine	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Import License- Small Ruminants	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Import License- Adult Poultry	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Import License- One-day Chicks	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Import License-Lipoids	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Import License- Pets	500	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Import License- Wild Species	200	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and By Products of Animal Origin Import License- Meat and Meat Products	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and By Products of Animal Origin Import License- Milk	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and By Products of Animal Origin Import License- Dairy Products	150	Yes	-	-

Ministry of Agriculture and Food Security- Veterinary Services	Products and By Products of Animal Origin Import License- Eggs	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and By Products of Animal Origin Import License- Fur	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and By Products of Animal Origin Import License- Hunting Trophies	200	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and By Products of Animal Origin Import License- Forage	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and By Products of Animal Origin Import License- Horses and Donkeys	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Export Phytosanitary Certificate- Cattle	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Export Phytosanitary Certificate- Swine	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Export Phytosanitary Certificate- Small Ruminants	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Export Phytosanitary Certificate- Small Species	150	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Export Phytosanitary Certificate- Pets	500	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Live Animals Export Phytosanitary Certificate- Wild Species	500	Yes	-	-

Ministry of Agriculture and Food Security- Veterinary Services	Products and Sub-products Phytosanitary Certificate for Exports of animal Origin- Meat and Meat Products	100	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and Sub-products Phytosanitary Certificate for Exports of animal Origin- Milk	100	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and Sub-products Phytosanitary Certificate for Exports of animal Origin- Dairy products	100	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and Sub-products Phytosanitary Certificate for Exports of animal Origin- Eggs	100	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and Sub-products Phytosanitary Certificate for Exports of animal Origin- Fur	100	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and Sub-products Phytosanitary Certificate for Exports of animal Origin- Hunting Trophies	200	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Products and Sub-products Phytosanitary Certificate for Exports of animal Origin- Forage	100	Yes	-	-
Ministry of Agriculture and Food Security- Veterinary Services	Transit license	150	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Import phytosanitary license for commercial (More than 50 kg of products)	150	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Phytosanitary and sample collection inspection on imports of less than 5 tons	80	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Phytosanitary and sample collection inspection on imports (6-10 tons)	160	-	Yes	Yes

Ministry of Agriculture and Food Security- Agriculture Services	Phytosanitary and sample collection inspection on imports (11-50 tons)	800	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Phytosanitary and sample collection inspection on imports (51-100 tons)	1,600	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Phytosanitary and sample collection inspection on imports (101-500 tons)	2,400	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Phytosanitary and sample collection inspection on imports (501- 1,000 tons)	4,000	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Phytosanitary and sample collection inspection on imports (1,001- 5,000 tons)	8,000	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Phytosanitary and sample collection inspection on imports (5,001-10,000 tons)	12,000	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Phytosanitary and sample collection inspection on imports (10,001-20,000 tons)	16,000	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Phytosanitary and sample collection inspection on imports (More than 20,001 tons)	24,000	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Import Inspection of fresh flowers (Less than 20 kg)	100	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Import Inspection of fresh flowers (21- 100 kg)	200	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Import Inspection of fresh flowers (101- 200 kg)	400	-	Yes	Yes

Ministry of Agriculture and Food Security- Agriculture Services	Import Inspection of fresh flowers (201- 2,000 kg)	1,000	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Import Inspection of fresh flowers (More than 2,000 kg)	2,000	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Import Inspection of plant materials (stakes, plants, forks, sweet potato branches and other plant material)- Less than 10 kg	50	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Import Inspection of plant materials (stakes, plants, forks, sweet potato branches and other plant material)- 11-50 kg	100	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Import Inspection of plant materials (stakes, plants, forks, sweet potato branches and other plant material)- 51- 100 kg	150	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Import Inspection of plant materials (stakes, plants, forks, sweet potato branches and other plant material)- 101-1,000 kg	500	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Import Inspection of plant materials (stakes, plants, forks, sweet potato branches and other plant material)- More than 1,001 kg	1,000	-	Yes	Yes
Ministry of Agriculture and Food Security- Agriculture Services	Export Phytosanitary license for commercial purpose (More than 50 kg)	150	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export Phytosanitary inspection and sample collection (Less than 5 tons)	100	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export Phytosanitary inspection and sample collection (6-10 tons)	200	Yes	-	-

Ministry of Agriculture and Food Security- Agriculture Services	Export Phytosanitary inspection and sample collection (11-50 tons)	1,000	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export Phytosanitary inspection and sample collection (51-100 tons)	2,000	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export Phytosanitary inspection and sample collection (101-500 tons)	3,000	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export Phytosanitary inspection and sample collection (501-1,000 tons)	5,000	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export Phytosanitary inspection and sample collection (1,001-5,000 tons)	10,000	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export Phytosanitary inspection and sample collection (5,001-10,000 tons)	15,000	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export Phytosanitary inspection and sample collection (10,001-20,000 tons)	20,000	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export Phytosanitary inspection and sample collection (More than 20,001 tons)	30,000	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export inspection of fresh flowers (Less than 20 kg)	110	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export inspection of fresh flowers (21-100 kg)	220	Yes	-	-

Ministry of Agriculture and Food Security- Agriculture Services	Export inspection of fresh flowers (101-200 kg)	440	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export inspection of fresh flowers (201 - 2,000kg)	1,100	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export inspection of fresh flowers (More than 2,000 kg)	2,200	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export inspection of plant material (takes, plants, forks, sweet potato branches, other plant materials)- Less than 10 kg	50	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export inspection of plant material (takes, plants, forks, sweet potato branches, other plant materials)- 11-50 kg	100	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export inspection of plant material (takes, plants, forks, sweet potato branches, other plant materials)- 51-100 kg	150	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export inspection of plant material (takes, plants, forks, sweet potato branches, other plant materials)- 101-1,000 kg	500	Yes	-	-
Ministry of Agriculture and Food Security- Agriculture Services	Export inspection of plant material (takes, plants, forks, sweet potato branches, other plant materials)- More than 1,001 kg	1,000	Yes	-	-
Ministry of Health- Department of Pharmacy	Request of drug registration/ one-off payment	4,000	Yes	-	-
Ministry of Health- Department of Pharmacy	Registration of drug/each generic	1,000	Yes	-	-

Ministry of Health- Department of Pharmacy	Request of drug registration, for each pharmaceutical and/or dose for new molecule or for brand drug (with patent)	6,000	Yes	-	-
Ministry of Health- Department of Pharmacy	Registration of drug for each supplementary dose or brand drug	2,000	Yes	-	-
Ministry of Health- Department of Pharmacy	Request of drug abbreviated registration	4,000	Yes	-	-
Ministry of Health- Department of Pharmacy	Registration of drug through the abbreviated process	2,000	Yes	-	-
Ministry of Health- Department of Pharmacy	License for imported drug registration for each pharmaceutical form and/or dose	16,000	Yes	-	-
Ministry of Health- Department of Pharmacy	Request of license renewal and Drug registration for imported drugs	8,000	Yes	-	-
Ministry of Health- Department of Pharmacy	Annual fee to retain drug registration/for each product	500	Yes	-	-
Ministry of Health- Department of Pharmacy	Special import request	4,000	Yes	-	-
Ministry of Health- Department of Pharmacy	Registration certificate	2,000	Yes	-	-

Ministry of Health- Department of Pharmacy	Licensing of importers and distributors	9,000	Yes	-	-
Ministry of Health- Department of Pharmacy	Renewal of license for importers and distributors	4,500	Yes	-	-
Ministry of Health- Department of Pharmacy	Annual fee for retention of the exploration license for importers and distributors	500	Yes	-	-
Ministry of Health- Department of Pharmacy	Export license request/ for each drug product	1,200	Yes	-	-
Ministry of Health- Department of Pharmacy	Export license request for other products/ for each product	2,500	Yes	-	-
Ministry of Health- Department of Pharmacy	Inspection of goods practices for issuance of Certificate by the origin of the product- African countries	75,000	-	Yes	-
Ministry of Health- Department of Pharmacy	Inspection of goods practices for issuance of Certificate by the origin of the product- Middle East	87,000	-	Yes	-
Ministry of Health- Department of Pharmacy	Inspection of goods practices for issuance of Certificate by the origin of the product- Asia/India	87,500	-	Yes	-
Ministry of Health- Department of Pharmacy	Inspection of goods practices for issuance of Certificate by the origin of the product- Latin America	87,500	-	Yes	-

Ministry of Health- Department of Pharmacy	Inspection of goods practices for issuance of Certificate by the origin of the product- Europe	100,000	-	Yes	-
Ministry of Health- Department of Pharmacy	Inspection of goods practices for issuance of Certificate by the origin of the product- USA and Canada	115,000	-	Yes	-
National Institute for Fish Inspection-INIP	Authorization license for the establishment of fishery processing unit for export	3,000	Yes	-	-
National Institute for Fish Inspection-INIP	Authorization license for the operations of a fishery processing unit for export	4,000	Yes	-	-
National Institute for Fish Inspection-INIP	Microbiology testing for Crustaceous (surface shrimp, lobster), including live bivalves	450	Yes	-	-
National Institute for Fish Inspection-INIP	Chemical testing for Crustaceous (surface shrimp, lobster), including live bivalves	300	Yes	-	-
National Institute for Fish Inspection-INIP	Sensorial testing for Crustaceous (surface shrimp, lobster), including live bivalves	120	Yes	-	-
National Institute for Fish Inspection-INIP	Microbiology testing for Crustaceous (deep water shrimp, lobster and others)	400	Yes	-	-
National Institute for Fish Inspection-INIP	Chemical testing for Crustaceous (deep water shrimp, lobster and others)	250	Yes	-	-
National Institute for Fish Inspection-INIP	Sensorial testing for Crustaceous (deep water shrimp, lobster and others)	100	Yes	-	-
National Institute for Fish Inspection-INIP	Microbiology testing for fish, cephalopods and gastropods	350	Yes	-	-

National Institute for Fish Inspection-INIP	Chemical testing for fish, cephalopods and gastropods	200	Yes	-	-
National Institute for Fish Inspection-INIP	Sensorial testing for fish, cephalopods and gastropods	80	Yes	-	-
National Institute for Fish Inspection-INIP	Microbiology testing for dry fish, smoked fish and cured fish	300	Yes	-	-
National Institute for Fish Inspection-INIP	Chemical testing for dry fish, smoked fish and cured fish	150	Yes	-	-
National Institute for Fish Inspection-INIP	Sensorial testing for dry fish, smoked fish and cured fish	60	Yes	-	-
National Institute for Fish Inspection-INIP	Microbiology testing for others	500	Yes	-	-
National Institute for Fish Inspection-INIP	Chemical testing for others	350	Yes	-	-
National Institute for Fish Inspection-INIP	Sensorial testing for others	150	Yes	-	-

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