

IMPORT PERMIT

Products Intended for Human Consumption Requirements for Importing Animal Products

The importation of animal products in the cases described by Appendix I of Normative Instruction 51/2011 requires prior authorization by the Ministry of Agriculture, Livestock and Food Supply (MAPA), which will assess if the product meets the animal and public health requirements.

Queries on the animal health requirements applicable to the export of animal products to Brazil may be submitted directly to the System for Animal Information and Certificates (SISREC) or upon query to the Coordination Office for Animal Transit and Quarantine (CTQA) of the Department of Animal Health.

Concerning public health, products may only be imported when:

- They come from countries whose health inspection has been assessed or recognized as equivalent by the Department of Inspection of Animal Products. For an updated list of countries authorized to export animal products to Brazil, click here.
- They come from establishments listed for export to Brazil. For a list of foreign establishments listed for export to Brazil, click here.
- They have been registered in advance by the Department of Inspection of Animal Products (DIPOA). For information on product registration, click here.
- They are labeled in accordance with the specific legislation and come with a health certificate issued by the competent authority in the country of origin, according to the bilateral agreements.

How is prior authorization for importation obtained?

MAPA may be requested to give prior authorization for the importation of edible animal products at any time before the products enter Brazil. Use the LECOM computer system in order to request what is provided for in Article 5 of Normative Instruction 34/2018: access the service entitled "Request Import Permit for Animal Products"; this service has been available since February 15, 2019.

Only requests for import permits for samples with no commercial value will be filed outside the system by means provided by the SIPOA in the location of the importer. The forms of Appendices I and III of Memorandum-Circular no. 148/2018/DHC/CGI/DIPOA/MAPA/SDA/MAPA must be presented for the request.

As of July 18, 2019, when the second version of the LECOM system went live, the following are required in order to request import permit for edible animal products:

Corporate Taxpayer's ID (e-CNPJ) in the Brasil Cidadão program. To obtain the Corporate Taxpayer's ID (e-CNPJ) seal, a natural person of the company's corporate structure must follow

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(Corporate Taxpayer's ID), both for the headquarters and for branch offices. Therefore, the digital certificates of the headquarters are not valid for registering the branches.

Naming employees who will access the service on behalf of the legal entity (optional);

Import Permit (LI) entered in SISCOMEX, with a reply from the Animal Health Service;

Copy of the most recent approved registration and label sketch attached to VICOMEX files;

Reinspection location form (FLR) signed by the person in charge (new template). Be aware that requests filed using templates other from the standardized template will be denied.

the steps described by the Service Request Manual. Registration is performed per CNPJ

After logging in, the legal entity or its named employee should fill out the request with information on the importer, applicant, manufacturer and product. The case file will then be automatically distributed to a regional official Service for the Inspection of Animal Products (SIPOA) and assigned to an analyst who will issue an import permit or deny the request. Click on the presentation and guidelines links for the materials available on the second version of LECOM.

The final deadline for the analysis of requests is up to 30 days from the date on which they were filed in the electronic system.

It is worth mentioning that Circular Letter (Ofício-Circular) no. 2/2019/DOF/CGVIGIAGRO/SDA/MAPA has exempted replacement Import Permits (LIs) from the need for new authorization, provided that the replaced LI had already been authorized and the reason for the change is: (i) monetary, (ii) exchange rate, (iii) tax, (iv) weight (except for imports of samples with no commercial value), (v) extension of expiry date of the currently valid LI. A replacement LI must therefore be issued before the replaced LI has expired and the reason for replacement must be recorded in the "Supplementary Information" field. The Import Permit may thus be produced for VIGIAGRO assessment at the point of entry.

Queries about the request for import permits via electronic system: inquire at dimp.dipoa@agricultura.gov.br.

Main Reasons for Request Denials

Since the computer system for prior authorization for importation of edible animal products which assigns the applications throughout the country for analysis was introduced, the Division for Imported Products (DIMP) of the Department of Inspection of Animal Products (DIPOA) has received complaints from importers about denials of import permits.

Several meetings were held with analysts and forwarding agents in order to standardize procedures before the computer system was deployed.

We would like to draw users' attention to the most frequent reasons for denial.

1. Errors when filling out the reinspection form. The document consists of two parts. The first should be signed by the individual who is legally responsible for the Federally-inspected (SIF) or Listed Establishments (ER) company where the reinspection will take place. The second should be signed by the MAPA employee responsible for the inspection of the Federal Inspection Service (SIF) or Listed Establishments (ER) where the reinspection will take place. It is possible to use the same form for more than one Import Permit (LI) provided that they are all recorded in the document.



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- 2. <u>Mandatory information missing from Import Permit (LI)</u>. Article 6 of Normative Instruction 34/2018 establishes mandatory information that should be recorded in the Import Permit (LI). Information which is not part of the standard SISCOMEX scope should be entered in "Supplementary Information" or in "Product Details".
- 3. <u>Revoked registration or label sketch</u>. The most recent registration approved by MAPA must always be part of the VICOMEX files.
- 4. <u>Documents missing from VISCOMEX files</u>. Either the necessary documents to file the request were not attached, or the files were not linked to an Import Permit (LI). The latter process is not mandatory, but it makes the analysis procedure easier. Therefore, in order to expedite the process, we recommend you do that.
- 5. <u>Errors when filling out the electronic form</u>. The process flow in the LECOM system is a one-way flow. Therefore, after the process is submitted for analysis, it is no longer possible to make corrections or file a new request for an already filed Import Permit (LI) until the analyst's report is released. It is important that the applicant review all information before submitting the form in order to avoid rework.
- 6. <u>Discrepancies in manufacturer information</u>. The control number, corporate name and address of manufacturer on the Import Permit (LI) and on the LECOM request must be the same as those in the MAPA database (SIGSIF). Any discrepancies will result in denial of the Import Permit (LI). Foreign establishments that have made changes to the registration will be allowed to use the registrations of approved products, as well as packaging and labeling produced before the change, for a period of 1 (one) year from the date the change was implemented. If changes to the registration have taken place before Circular Letter (Ofício-Circular) no. 9/2019/DIMP-CGI/CGI/DIPOA/SDA/MAPA, the period of 1 (one) year shall be granted from the date of publication of the document.
- 7. <u>Different information from that recorded in the "Product Details" field of the Import Permit (LI)</u>. It is common for other consenting agencies to require particular information to be included in the "Product Details" field to make consignment identification and clearance easier, but they may conflict with information standardized by MAPA in the registration of the products. To avoid requests for prior authorization for importation being denied, we advise interested parties to make it clear what information is relevant to other agencies and what is relevant to MAPA.