Authorized Economic Operators in Mozambique Report

Supporting the Policy Environment for Economic Development (SPEED+)

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# Introduction and context

The World Customs Organizations (WCO) defines an Authorized Economic Operator as *a party involved in the international movement of goods in whatever function that has been approved by or on behalf of a national customs administration as complying with WCO or equivalent supply chain security standards*.

This means that economic operators who comply with specific standards, related to supply chain security and to compliance with legal and fiscal obligations, can receive certain privileges such as faster customs clearance. This is a win-win for both customs (who can focus their efforts on more risky consignments) and for AEOs (who should see improvements in average release times).

The AEO approach is anchored in a broader customs reform approach designated SAFE, which is a framework of standards that aim to increase security of trade, and to facilitate trade. The four pillars of SAFE are a) advance electronic information: Harmonize the advance electronic information requirement on inbound, outbound and transit shipments, b) risk management: Commit to employing a consistent risk management approach to address security threats, c) outbound inspection: Outbound inspection of high risk consignments being exported, preferably using non-intrusive inspection methods and d) Business partnerships: Customs will provide benefits to businesses that meet minimal supply chain security standards and best practices. It is under this last pillar that the figure of AEO fits[[1]](#footnote-1).

The figure of Authorized Economic Operator (for importers and exporters) was introduced in Mozambique in 2009 and operationalized in 2012. Since then, 10 licenses for AEO status have been issued to importers, of which 2 have since ceased importing. It is the stated objective of the General Directorate of Customs to increase the number of AEOs, as a key method for improving average release times and facilitating trade, without compromising on security.

# Objectives of the study

At the request of the Directorate General of Customs, SPEED+ carried out this brief study to establish why so few companies have received an AEO license so far, and how this could be changed. The study does not aim to assess the AEO scheme *per se*, but rather to address the issue of how to increase adherence to the scheme. The aim was to develop a clear practical and feasible roadmap for increasing the number of AEOs in Mozambique. The study was a rapid assessment and not an in-depth analysis – where appropriate, areas for further analysis are identified throughout the report.

It should be noted from the beginning that the criteria for becoming an AEO are, naturally, high, and therefore the target group for AEO licenses is not large. Customs do believe, however, that there is potential to attract more AEOs who would be able to fulfill the criteria, and thereby benefit from the license. This in turn would enable customs to focus more of their efforts on higher risk consignments.

Key questions addressed by this study include:

* What is the level of understanding/knowledge about the AEO figure amongst the potential beneficiary companies?
* What have been the main constraints for companies which showed interest in obtaining an AEO license and either gave up or were rejected?
* Why have so few companies obtained an AOE license?
* What has been the experience of the existing AEOs and what lessons can be drawn from these to increase adherence to the scheme.
* What could be done to increase uptake of the AEO license (without relaxing the necessarily stringent requirements)?

# Methodology

Field work was carried out over a week in August 2017 in Maputo, by a consultant accompanied by 2 customs officials. Data collection consisted in interviews with 7 of the existing 8 AEOs and various members of the customs team, analysis of customs documentation, and a questionnaire sent to the customs brokers for the top 100 importers, as well as distributed by the two leading trade associations in the country, the CTA and ACIS.

Semi-structured interview guides can be found in Annex 1. Key areas of focus included: background information on the company, particularly what products and volume they import, the decision to apply for AEO status, the process of application, and experience after obtaining the license. Interviews were carried out in Maputo, Boane and Matola, all importers, some of raw materials and some of finished goods. All interviewees were happy to be quoted anonymously, and 2 were happy to be named.

For analysis of the principal reasons that companies either gave up on the process before obtaining a license, or were rejected by customs, use was made of the customs records kept for each process.

For information about the level of knowledge of the AEO figure, the process to apply and the possible benefits, use was made of a questionnaire, which can be found in annex 2.

It should be noted that the time for the assignment was fairly short, and in particular 1 AEO was not interviewed, and response to the questionnaire was fairly limited (9 responses). Conclusions are therefore at times somewhat tentative and may require further investigation.

# Authorized Economic Operators in Mozambique

The figure of AEO was introduced in 2009 in Decree 34/2009, and operationalized in 2012 through approval of Ministerial Order 314/2012 which established the regulations for AEO treatment.

The diploma establishes that an OEA is a (author’s translation) *legal entity that, in the course of its professional activity, and after evaluation of the compliance with the conditions and criteria established by the customs administration, is considered to be a reliable and trustworthy operator, being able [therefore] to benefit from additional advantages in the process of customs clearance.*

The benefits for AEOs are defined in broad terms in the Ministerial Order, which states for example (author’s translation):

1. *Faster electronic customs clearance;*
2. *Physical and document inspections [only] where strictly necessary;*
3. *Priority treatment when selected for inspection; and*
4. *Personalized notice, in advance, of risk based documentary or physical inspections or re-inspections.*

The criteria for receiving AEO status are defined in the regulations as follows (author’s translation):

1. *Record of compliance with fiscal and customs obligations;*
2. *Satisfactory system of commercial record keeping which allows for fiscal and customs inspections;*
3. *Proven financial solvency; and*
4. *Approval from customs following an inspection.*

The diploma further states that for compliance with line b above, the company should (author’s translation):

1. *Maintain an accounting system which is compatible with generally accepted principles of accountancy and which facilitates customs control through audit.*
2. *Allows the Revenue Authority, through Customs, physical and electronic access to its customs’ records.*
3. *Has a logistics system which allows the possibility to distinguish between goods which benefitted from the OEA regime from the rest.*
4. *Has an administrative organization that permits the management of flows of goods, and has a system of internal control that allows for the verification of legality and regularity of transactions.*
5. *Has satisfactory archiving procedures for company records and mechanisms to protect against loss of information.*

In the diploma is also a list of documentation which should be submitted, including company accounts from the preceding 3 years, which are ‘duly audited’. This is interpreted by Customs to mean externally audited by an internationally recognized firm.

Since the introduction of the figure of AEO in 2012, 10 companies, all importers, have received AEO licenses. The full list can be found in Annex 3. A further 22 applied, and were either rejected (9), or gave up before completing the process (13).

# Key Findings

This section lays out some of the key findings, based on the interviews, documentary analysis and responses to questionnaires.

## Limited Knowledge of the AEO scheme amongst possible beneficiaries.

Of the 9 large importers that responded to the questionnaire, all but one stated they either had no knowledge of the AEO scheme, or that they had heard of it but did not know the details. One also stated they while they did not know the details, they believed the process would be complicated and lengthy. All stated that they would be interested in adhering if they had more information, particularly about the process to apply and the benefits that they would receive in comparison to other companies. While the sample is small, this clearly shows that there is at least potential to increase the adherence to the AEO scheme if more information could be provided to the target group and if these considered the benefits worthwhile. Given that the majority had heard of the scheme but didn’t know the details, this also suggests that this group have not been sufficiently motivated to find out more – possibly because of a belief that the process is complex and lengthy, as stated by one of the respondents.

## Limited proactivity and tools for Customs to increase awareness.

If it is a key objective of customs to increase adherence, then customs need to proactively address this. It should also be noted that from interviews with the current AEOs, most that were able to recall the reasons for the company applying for the license stated that this was either due to problems they had been having, or the specific nature of the products, which led them to consult with customs who then recommended applying for AEO status. Thus, they were encouraged to apply for an AEO license by customs only *after* they approached customs, rather than a more proactive approach of customs targeting potential beneficiaries and explaining the process and benefits.

To be fair, Customs do not currently have the tools available to be more proactive. They do not have a database of potential ‘targets’ for the scheme, and they do not have a means to contact these companies, apart from indirectly through the brokers. Customs also do not have a clear list of the practical benefits of the scheme, that goes into more specific detail than the diploma, which could easily be turned into a brochure or guide. Customs also do not have a system of regular contact with the existing AEOs to ensure they are benefitting from the scheme and to resolve any concerns.

## Many companies initiate the process and either give up, or are rejected.

A large number of companies that initiate the process of applying for a license do not complete it. Of 32 that opened processes with customs for obtaining a license, only 10 were approved. Of those that either were rejected or gave up, many were missing large numbers of documents – i.e. there wasn’t one particular document which they did not submit. This suggests that companies may be initiating processes without realizing the full extent of the requirements. One area that there seems to be some misunderstanding is around the audits of the preceding three years, and whether it is sufficient that these be audited by an accountant or by an internationally recognized external audit firm. Interviews with existing AEOs confirm this, with some stating they were unaware they would have to use an external audit firm. Another firm that gave up had accounts in English, and needed to get these translated officially, although without further follow up it is impossible to know if this was the binding constraint for this company.

Despite the external audit possibly being a constraint, the biggest reason for companies to give up or to be pending for a long time is the resolution of pending issues in the MCNET system. These occur when processes may be opened and not properly closed – either due to partial delivery of consignment, early release which was not later closed off in the system, human error of the broker or customs agent, or other reasons. Of the 13 companies who have their processes ‘pending’ in the system, including some that have been pending for over a year, nearly half have submitted all documentation and are *only* missing the resolution of the pending items in the system. Given that this is the last stage of the process, and companies have by this stage submitted all documents and passed through the inspection, better resolution of the pending items in the system might quickly increase the number of AEOs. Customs confirm that there is a dedicated focal point to resolve difficulties with regard to this – often a customs broker may no longer be operating and therefore be unable to provide adequate documentation and customs are prepared to deal with this – but this does not seem to be widely known by companies, as some of the AEOs also stated that the resolution of pending items in the system, often going back many years, was the most complex part of the process. This may be due to a lack of direct contact between customs and the companies, as the broker is often the communication channel between the two.

## Overall satisfaction with support provided by customs during the process of application.

Despite AEOs stating the process to obtain the license was complex and lengthy, all that could recall the application process stated that the support from the Directorate General was good, including in one case for a license renewal, and many were able to cite specific contacts they had had during the process that had supported them in anything they needed. One frustration highlighted by one company was that customs provided a list of the numbers of the processes pending in the MCNET system and then the company or its broker had to contact a different part of customs to get more information in order to clear the pending items, suggesting that perhaps customs could be more joined up in providing everything the company would need, but this was a minor complaint.

## Full acceptance of the need for stringent requirements to qualify as an AEO.

All the AEOs interviewed accepted that the requirements to qualify for an AEO license should be high, and despite having found the process time consuming and at times complex, none suggested that the requirements should be reduced. This is encouraging, as this is a key component of the AEO approach – which is, by design, only targeted at companies which have the highest standards of controls and security.

## Benefits of the AEO scheme are not clearly defined or understood and are not uniformly applied.

Apart from the general language in the diploma, there is no specific list of the practical benefits an AEO might expect to receive. This is problematic, as if management within a company are not clear on the practical benefits that AEO status will bring, and the direct impact on their operations, they will be understandably reluctant to dedicate time and money to obtaining the AEO status.

The approach seems to be that the AEO will be flagged in the system and so this may influence decision making of customs officials should there be an issue to resolve. In fact, a number of companies identified this as a benefit – when a problem arises, some officials may be more inclined to allow early release for example. However, one company contradicted this and did not feel that having AEO status made any difference. One company interviewed was not even aware they had the AEO license and stated that the process for customs clearance had not improved for his business in ten years. Others felt that benefits of AEO status depended on the customs official in charge. It may also be that it depends on how well the customs broker understands and leverages the status of AEO of his/her client.

It is of concern that even some of the companies which have received an AEO license were unable to clearly articulate the benefits this brings them. One AEO with a highly fragile product that deteriorates rapidly was extremely satisfied and said that having the license reduced time at the border, reduced the times the truck was opened, and reduced the problems of deteriorated products arriving at unpredictable times at the factory. However, a number of AEOs, including another importing fresh produce, stated that they did not feel the expected benefits had been obtained, and that there had been no or little impact on their business or on time at the border.

Some AEOs complained that the recent move from the ‘Frigo’ to KM4 was a backward step, because as an AEO at the Frigo they were able to simply submit their documentation, and within an hour proceed (“direct unloading”), without even entering the premises, whereas at KM4 they must enter, pay parking and even when things run smoothly, they estimate the clearance process takes 3-4 hours. While Customs have their reasons for this change, it does nonetheless reduce the benefits of AEOs according to some of the companies interviewed.

Customs officials interviewed also were unable to clearly list practical benefits of the scheme, preferring to state that it ‘influences’ decisions and build relationships. They stated that it increased speed of border crossing, but were unable to specify exactly how. It should be noted however that field work did not include interviewing officials allocated at the border, who may have a clearer idea of how they handle AEOs on a daily basis. It is also possible that the benefits an AOE sees depend on how well the customs broker understands and leverages the status of AEO, acting as advocate for the companies at the border.

## Benefits just limited to customs but a number would like priority in other areas

A number of AEOs interviewed stated that they felt the benefits of the AEO status could be improved by also being applied to other parts of the import process. One specific example was the need to obtain a PSI certificate, and a belief that as AEO, the company should be able to do this in parallel with applying for a sanitary or phytosanitary license rather than having to wait for the PSI certificate to be issued before even starting the process for the SPS license. Another also felt they should have priority treatment from agencies issuing SPS licenses, such that AEOs should ‘go to the top of the queue’.

Lack of regular direct contact between companies and customs.

Role of the Customs Broker complicates relationship building.

AEOs interviewed did not necessarily feel they had a direct relationship with customs, with one stating ‘we don’t know who to talk to if we have a problem’. While the diploma refers to a call center for AEOs, this does not seem to exist; at least, the AEOs do not seem to be aware of it. While a call center *per se* may not be the solution, a lack of regular contact with existing AEOs means that customs are not aware of the experience these are having. This is important both in order to feed into advocacy activities to encourage adherence (companies are far more likely to take note of other companies’ positive experiences than simple exhortations from customs) and also to address any issues with the day to day activities of the AEOs. This would also help companies prepare for license renewals which they need to carry out every 3 years.

Due to a reliance on customs brokers, customs do not even have all the up to date contact details of the 8 existing AEOs. Until this study, they were not aware that one of the previous AEOs had ceased to import. This is not a criticism of customs but an example of how the lack of regular contact reduces the effectiveness of the scheme.

It is also possible that some of the companies who believe they have not benefitted from the AEO scheme, in fact have done so, but that the credit is being taken by the brokers. Without a more in-depth analysis of each case (which could be done if customs were in regular contact with the companies) it is impossible to know.

## Despite some frustrations, on the part of some of the AEOs, almost all believe that it was worthwhile for their business obtaining the AEO license.

As seen above, some OEAs are satisfied with the OEA license and others feel that they have not received the benefits they expected, or indeed have not received any benefits. It will be important to understand why this is the case. However, all but one of the companies interviewed felt that despite it being a large investment of time and money, applying for the OEA was worthwhile. Around half stated they would recommend other companies apply. This was based on a belief that it made problem resolution easier, and that it allowed a better relationship with customs, some believed it did lead to benefits and others were hopeful it would in the future. So while it is clear that improvements could be made, there is clearly enough support for the OEA scheme to advance with activities to increase adherence.

# Recommendations

Based on the above findings, the following recommendations can be made in order to increase the adherence to the scheme. These aim to do four things: first, *clarify, improve and harmonize the proposition* – the benefits in terms of impact on business has to be worth the investment of time and money to get a license, and there is mixed feedback about whether this is the case; second, *increase awareness* – identify target companies and inform them of the benefits they would receive, and the process to apply; third, *make it easier to apply* and support companies during the process, and finally, *maintain contact with the AEOs* – ensure regular contact and feedback, and use them to encourage others to apply.

## Clarify, Improve and Harmonize the Proposition.

Customs need to first clearly specify the benefits, rights and obligations of an AEO, in practical terms, beyond what is established in the Diploma, and if possible increase the benefits available to AEOs. Customs themselves need to be clear on the practical benefits, which should go beyond simply resolving problems when they arise. Support could be requested from the WCO or other international bodies to understand the benefits offered in other countries. For example, one of the benefits of AEO status in other countries is a significantly reduced likelihood of being selected for physical inspection. However, it seems that all consignments are inspected in Mozambique, which is not currently fully applying a risk based approach to physical inspections. Another example of a benefit to AEOs in other countries is fewer physical and document controls, however in Mozambique it would seem that AEOs currently follow the same procedure as other companies, with the exception that should problems arise, they may be more easily granted early release and trusted to rectify matters later. However, this option is technically available under the regulations to any company, at the discretion of the customs official.

Customs should meet formally with the 8 existing AEOs, to learn more about their needs and experience, and listen to their recommendations or requests for how to improve the proposition. In particular, it will be important to address the differences in experience between those who believe it has had a big impact on their business, vs. those who have seen little or no difference and to try to identify why this might be the case.

Customs should also assess the possibility of improving the benefits available to AEOs with regard to for example PSI and SPS processes, or even third parties who provides services at borders. Again, the experience of other countries may be instructive.

Finally, benefits need to be applied uniformly – in the same way by all customs officials, at all borders, for all AEOs. This will require increased training of customs officials on the rights of AEOs, as well as of customs brokers so that these can advocate on behalf of their AEO clients.

## Increase Awareness.

Once the proposition is clear and improved, and being uniformly applied, customs can proceed to increasing awareness. This should be as targeted as possible – by definition the AEO scheme is likely to be most attractive and feasible for large, well organized, regular importers (or exporters). Information should be targeted at companies that have realistic chance of approval, and these can initially be identified through the MCnet system. For example, the top 100 importers (and, also, exporters if so desired) could be identified and targeted specifically. Companies importing specific categories of goods who might benefit more from AEO status (e.g. fresh goods) could be targeted. The list of companies that gave up or were rejected could also be used, as a pool of companies which have shown initial interest but for some reason were unable to proceed – some may simply not fulfill the criteria, but others may just need some support to achieve compliance.

Awareness raising could be through brochures, adverts in newspapers, emails to brokers and to companies, liaison with key trade associations (e.g. CTA and ACIS), even television spots. Clear concise information on the benefits of being an AEO and the requirements should be produced, ideally in Portuguese and English. Dissemination workshops could be held in key urban centers.

One method to increase awareness is to use existing AEOs as advocates. Companies naturally are more inclined to listen to other companies than to government. The AEOs interviewed for this study were specifically asked if they would be willing to participate in workshops or other dissemination activities, and most were willing to do so. Most also said they would be willing to recommend to other companies, if they felt the benefits were worth it.

## Make it Easier to Apply.

The existing AEOs did not have many concerns regarding the support they received on application – without interviewing those who gave up or had their application rejected it is difficult to assess whether improvements could be made. Customs could consider identifying individual focal points who would be allocated to each potential AEO, who would be responsible for facilitating the process, acting for example as liaison if the company needed information from other parts of customs, or from MCnet for example.

Another constraint is the cost of the external audit – one option would be to liaise with one of the big audit firms to negotiate a discount for companies referred by customs, in return for greater numbers of audits and possibly using the logo of the selected company on the promotional material used to encourage adherence to the scheme.

## Maintain Contact with the AEOs.

Regular contact directly between customs and AEOs would enable greater feedback on how the scheme is running and enable customs to provide to AEOs the “VIP treatment” that they might expect as a ‘trusted importer/exporter’. The focal point allocated to assist with the application process could in turn become the ‘account manager’ so that AEOs, whenever they had queries or problems, would have a dedicated manager whose job it would be to work with the company to facilitate their import/export processes. An annual meeting between the General Directorate and AEOs (and their brokers) should be considered.

# Proposed Next Steps

If increasing adherence to the figure of AEO is a priority, then customs should identify someone within the team who can act as AEO manager – he or she can oversee implementation of the steps recommended above. To summarize, we would recommend the following steps, ideally supported by SPEED+ or another form of external financial support.

1. Identify a AEO manager, and a number of staff who will act as ‘account managers’ or focal points for existing and future AEOs.
2. Study of the experience of other customs agencies with AEOs in other countries (points below do not need to wait for this, but can happen in parallel).
3. Meeting between customs and the existing AEOs’ representatives (and their brokers) to discuss their experiences and how customs could better facilitate the trade of AEOs. This report could be used as the basis for the discussion.
4. Internal meeting of customs to develop a list of practical benefits that customs does/can provide to AEOs, including input from the meeting in point 2, and writing this up (this meeting could be externally facilitated if felt useful). This should include staff at the center and staff who work at some of the major borders.
5. If appropriate, liaison between customs and other entities (SPS licensing institutions, third party service providers) to develop other benefits for AEOs.
6. Training of customs officials and of customs brokers on the rights of AEOs (which may be expanded following points above).
7. Development of a database of contacts of companies that could potentially apply (using MCNET database).
8. Liaison with big audit firms to establish an agreement for sponsorship of the promotional material in return for a discount on the audit for any company applying for AEO status.
9. Development of promotional material such as brochures, adverts in the press, targeted emails (using the database in point 6), television spots to promote adherence, clearly stating the benefits and requirements. If possible, these should feature quotes from existing AEOs, many of whom are willing to be quoted either anonymously or not.
10. Workshop for target companies, presenting the figure of AEO and if possible including existing AEOs with positive experiences to advocate on behalf of the scheme.
11. Allocation of specific focal points for the application process and for support post attribution of the license. I.e. an ‘account manager’ for each company.
12. Annual meeting at senior level between existing AEOs and their brokers and the management of customs to ensure regular feedback.

# Conclusions

In conclusion then, it would seem that there is clear potential to increase adherence to the AEO scheme, which could potentially have a positive impact on the businesses of the companies, and on the operations of customs. However, to realize this potential, an investment of financial and human resources will be required to improve the benefits and inform potential beneficiaries.

# Annexes

**Annex 1 – Semi Structured Interview Guide**

|  |  |
| --- | --- |
| **Empresa** |  |
| **Data da Entrevista** |  |
| **Nome** |  |
| **Posição** |  |
| **Email** |  |
| **Telefone** |  |

**Detalhes do Negócio**

|  |  |
| --- | --- |
| Ramo/Produtos |  |
| Volume de Importação Anual |  |
| Valor de Importação Anual |  |
| Volume de Exportação Anual |  |
| Valor de Exportação Anual |  |
| Número de Trabalhadores |  |

**Estatuto de OEA**

|  |  |
| --- | --- |
| Quando é que recebeu o estatuto de OEA? |  |
| Como ouviu falar do programa de OEA? |  |
| Porque decidiu tornar-se OEA? |  |
| Como foi o processo de tornar-se OEA? |  |
| Qual foi o maior desafio? |  |
| Como foi o apoio que recebeu de DGA? |  |
| Recomendaria a outras empresas tornarem-se OEA? |  |
| Alguma recomendação sobre como melhorar o processo de atribuição do estatuto de OEA? |  |
| Alguma recomendação sobre como encorajar mais empresas a aderirem? |  |

**Impacto do Estatuto de OEA no Negócio**

|  |  |
| --- | --- |
| Qual tem sido o impacto de ser OEA? |  |
| Quais tem sido os benefícios de ser OEA? |  |
| Valeu o investimento de tempo para se tornar OEA? |  |
| Recomendaria a outras empresas tornarem-se OEA? Porque? [Podemos citar?] |  |

**Outros comentários**

|  |  |
| --- | --- |
| Tem outros comentários sobre o estatuto de OEA? |  |

**Annex 2 – Non AEO Questionnaire**

**Questionnaire for companies which import, but that do not have an “Authorised Economic Operator” Licence.**

1. Background information

|  |  |
| --- | --- |
| Company |  |
| Address |  |
| Sector |  |
| Name of Person filling in the questionnaire |  |
| Email address |  |
| Phone Number |  |
| What are the main products you import? |  |
| How many trucks/containers/tonnes do you import per month? |  |

1. Have you heard about the programme for Authorised Economic Operators, which permits companies that fulfil certain criteria to receive certain benefits in terms of faster and more flexible customs clearance?

|  |  |
| --- | --- |
| Yes |  |
| No |  |
| Heard about it but don’t know the details |  |
| Other (please specify) |  |

1. Why has your company not chosen to apply for AEO status?

|  |  |
| --- | --- |
| Not aware of the programme or not enough information. |  |
| Aware of the benefits but they are not important/necessary for the company (please explain). |  |
| It seems complicated or time consuming. |  |
| The requirement to have an external audit is too demanding or expensive. |  |
| Other requirements (beyond the audit) are too complex or demanding. |  |
| Don’t have the documents required (which?) |  |
| Other reasons (please explain). |  |

1. Would you be interested in becoming an Authorised Economic Operator?

|  |  |  |  |
| --- | --- | --- | --- |
| Yes |  | What would you need in terms of information and/or support? |  |
| Maybe |  | What would it depend on? |  |
| No |  | Why not? |  |

1. Are you aware of other companies that might benefit from the programme?

|  |  |  |
| --- | --- | --- |
| Name of the company | Person to contact | Email/Telephone |
|  |  |  |
|  |  |  |
|  |  |  |

1. Would you be interested in participating in a workshop or receiving more information about the programme and how to apply?

|  |  |
| --- | --- |
| Yes |  |
| Maybe |  |
| No |  |

1. Do you have any other comments you’d like to make in relation to the AEO programme?

|  |
| --- |
|  |

**Annex 3 – List of AEOs**

* Fermentos de Moçambique
* Higest Moçambique Lda
* Cervejas de Moçambique
* Merec Industries
* Terramar Nacala Lda
* Companhia da Sena S.A.
* Woolworths Moçambique Lda
* Sunera Cimentos

**Annex 4 – List of Interviewees**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Company** | **Name** | **Position** | **Email** | **Telephone** |
| Fermentos de Moçambique | Sr John Mabunde &  Sr Jalan | Production  Accounting | [jmabunda@fdm.co.mz](mailto:jmabunda@fdm.co.mz) | 82 7855760 |
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1. See the WCO wesbite here for more details on SAFE: <http://www.wcoomd.org/en/topics/facilitation/instrument-and-tools/tools/safe_package-for-new-site.aspx> [↑](#footnote-ref-1)