

July 29, 2011

The Honorable Eduardo D. Bianchi,  
Secretary of Industry, and Foreign Trade Ministry of Industry  
Julio A. Roca 651, 2 Piso Of. 206  
C1067ABB Buenos Aires, Argentina

**RE: Request for Facilitating the Administration of the Non-Automatic Import License System in Your Country**

Dear Mr. Eduardo D. Bianchi:

We are deeply grateful to be given this opportunity to submit our comments regarding the non-automatic import licensing system in your country. We are industry associations representing Japanese machinery manufacturers, trading companies, engineering companies, and electronic devices and component manufacturers. Japanese companies who are members of our associations are supplying a diversified range of products to meet the needs of consumers in Argentina.

Ever since the signing of the Treaty of Friendship and Commerce in 1898, Japan and Argentina have been building a friendly relationship. The government of Argentina has generously extended assistance in various forms after Japan was hit by the Great East Japan Earthquake on March 11. This certainly reflects the close relationship between the governments of Japan and Argentina. The business community also regards Argentina as an important growth market.

Your country has in place a non-automatic import licensing system that requires covered products to obtain a license from authorities prior to import. (NAIL : Resolutions No. 444/04 ; 689/2006 ; 588/2008 ; 589/2008 ; 61/2009 ; 165/2009 ; and 337/2009) The Official Gazette Resolution No. 45/2011 dated February 15, 2011, announced a measure that broadens in a significant way the list of products covered under the system. The new measure was implemented from March 7. As a result of this measure, the number of items that require an import license has now increased to approximately 600 items including the items that were previously subject to an import license.

Japanese companies dealing with products that were newly added to the list of items subject to a non-automatics import license have suspended shipments of the newly covered items to your country in order to comply with the measure. They have registered as an importer and are going through the procedures for obtaining an import license. There are, however, companies that have not yet been issued a license even after 60 days. After this new measure has been introduced, exports to your country have been suspended for an extended period of time, and difficulties are arising including inventory running out at local affiliated companies in Argentina. There is also the risk of losing customers and being held accountable for damage compensation.

According to Official Gazette No. 24425 dated January 5, 1995, a non-automatic import license is to be issued within 30 or 60 days from filing of an application. The measure does not provide for an extension of the period required for the procedures. Furthermore, companies continue to be denied predictability since there is no information from the authorities regarding the processing status of applications. The items newly subject to an import license include products that cannot be purchased or produced locally, and imports from overseas continue to be essential. Serious effects are starting to appear in the production/marketing plans and management plans of local companies. The resulting confusion will also have an adverse effect on trade and investment between Japan and Argentina, and may well become an impediment to economic development in your country.

In view of this situation, we wish to seek your special understanding for the difficulties faced by Japanese companies in exporting products to your country due to the administration of the non-automatic import license system. We would request your consideration in taking measures for facilitating trade, including the early issuance of licenses.

We thank you for taking your time to consider our comments. Please let us know if there are any circumstances inherent to Japanese companies that are causing this delay in issuing licenses. The Japanese industry intends to cooperate as much as we can for finding a solution to this issue, and we would be pleased to consult with you on concrete ways of facilitating trade between Japan and Argentina.

Sincerely yours,



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Executive Managing Director

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