



# Exporter Guidelines



## Import Verification Programmes



**BUREAU  
VERITAS**

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This brochure is intended to provide exporters with a general overview of Import Verification Programmes (IVP). To get more detailed information about the programme in a country in which Bureau Veritas Group is mandated, please refer to the corresponding data sheets available on our website [www.bureauveritas.com/gsit](http://www.bureauveritas.com/gsit)

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► GLOSSARY

ACV	= (WTO) Agreement on Customs Valuation
AWB	= Air Way Bill
BIVAC	= Bureau of Inspection, Valuation, Assessment and Control
BDV	= Brussels Definition of Value
B/L	= Bill of Lading
CFR	= Cost & Freight
CRF	= Clean Report of Findings
FCL	= Full Container Load
FOB	= Free on Board
GATT	= General Agreement on Tariffs and Trade
ID	= Import Document
IFIA	= International Federation of Inspection Agencies
IVP	= Import Verification Programme
LCL	= Less than Container Load
NNRF	= Non Negotiable Report of Findings
PSI	= Pre-Shipment Inspection
RFI	= Request for Inspection
ROF	= Report Of Findings
WCO	= World Customs Organization
WTO	= World Trade Organization

► Bureau Veritas / BIVAC offices

CRE	= Centre of Relations with Exporters, regional offices covering several countries
LO	= Liaison Office, located in the importing countries in which Bureau Veritas Group is mandated
PIC	= Physical Inspection Centre, offices located all over the world in charge of physical inspection



In an environment which is undergoing rapid change, **Bureau Veritas**, service company specializing in QHSE SA management (quality, health & safety, environment and social accountability), is one of the world's leading providers of import control and inspection services.

For more than 20 years, **Bureau Veritas** has been continuing its strategy to assist governments and international institutions by facilitating their foreign trade operations. Consequently, its efforts are focused on providing assistance to customs authorities and implementing programmes to maintain government revenues and encourage probity in international trade.

Thanks to its Government Services and International Trade Division (and to its specialized subsidiary, **BIVAC International**) it is acting as Preshipment Inspection (PSI) provider on all five continents. With its interventions, it contributes to facilitating international trade and safeguarding the economic development of countries using its services.

**Bureau Veritas** Group relies on its international network, comprising a workforce of more than 26 000, in 700 offices in more than 140 countries on all five continents. Its geographic deployment allows it to guarantee the services with utmost efficiency and local know-how, anywhere in the world.

**Bureau Veritas**, founding member of the International Federation of Inspection Agencies (IFIA) and its subsidiary **BIVAC International** are members of its Preshipment inspection Committee and adhere to its Code of Practice, based on the WTO agreements on Preshipment Inspection. These agreements accept that principles and obligations of GATT 1994 applying to the activities of preshipment inspection companies mandated by governments. User governments have to ensure that this entities perform their activities on a non-discriminatory and transparent manner, protect confidential business information, avoid unreasonable delays, follow specific directives for price verification and avoid conflicts of interest. In those terms, **Bureau Veritas** Group is committed to perform its inspection activities respecting this agreement.

All over the world, **Bureau Veritas** has been accredited by many countries and international organizations. ISO 9001 certification of all its activities worldwide confirms that **Bureau Veritas** Group exercises close control of the quality of its services, from their design to performance and verification.

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## IMPORT VERIFICATION PROGRAMMES

Through Preshipment Inspection Programmes (PSI), **Bureau Veritas** Group helps international trade operators to improve their business efficiency by making sure they comply fully with current legislation and to eliminate risk whenever possible. The purpose of these programmes is to verify the conformity of the goods to be imported in terms of quality, quantity, price and customs classification.

### PSI objectives:

- ▶ Facilitate and increase transparency in trading operations
- ▶ Meet government concerns about consumer protection and environmental issues
- ▶ Ensure compliance with current regulations and conformity of goods to contract specifications
- ▶ Optimise customs revenue collection
- ▶ Protect economic development
- ▶ Provide authorities with a high-performance tool and statistics for over seeing and controlling foreign trade

### Goods submitted to PSI:

- ▶ Generally, all goods over a minimum value are subject to preshipment inspection excepted those exempted.

### Goods exempted from PSI:

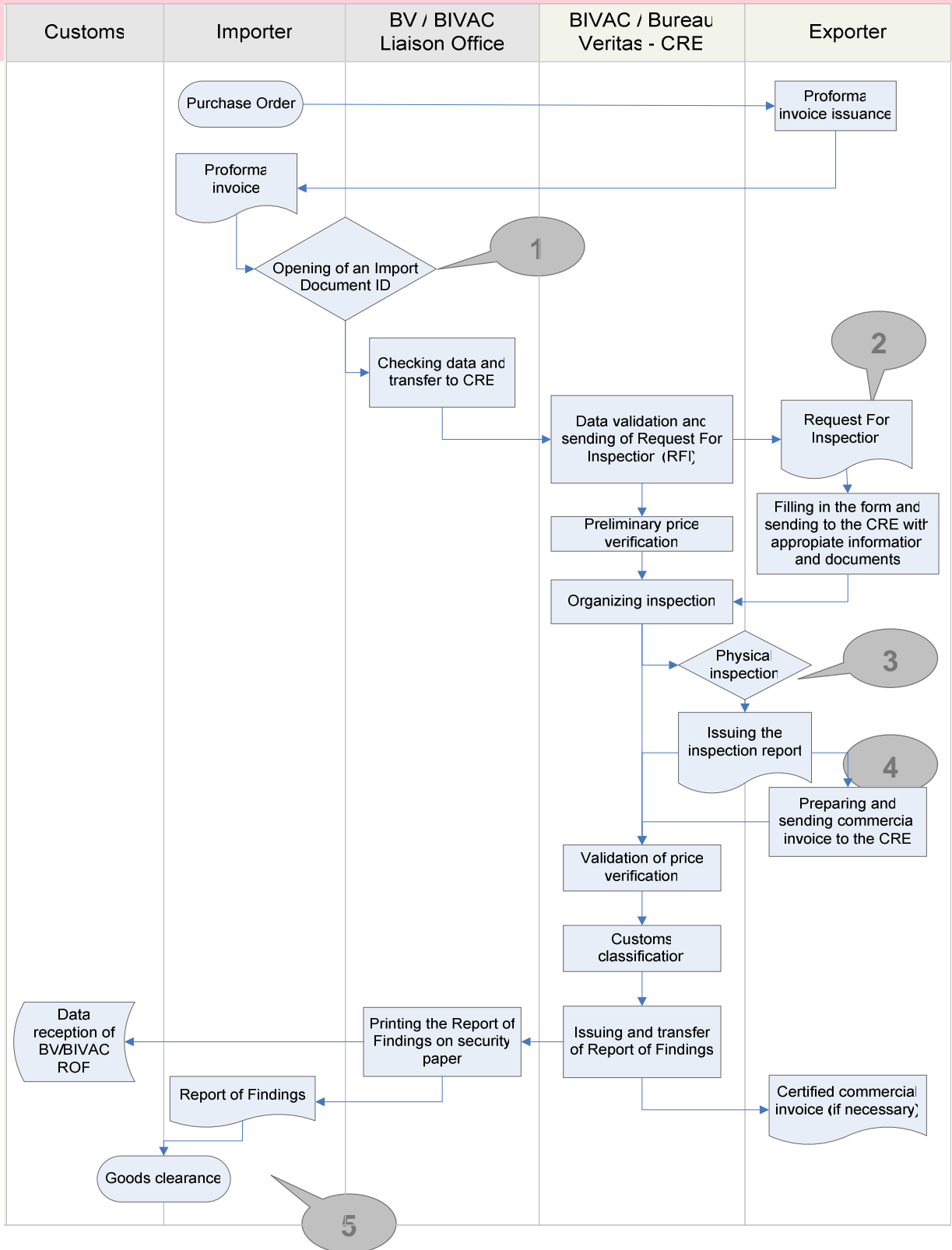
- ▶ Generally, some goods are exempted from preshipment inspection, for instance:
  - Gold and precious stones;
  - Objects of art;
  - Arms and ammunitions;
  - Parcel post;
  - Donations made by foreign governments or by international organizations to non-government, charity or public utility organizations
  - Donations and supplies to diplomatic and consular missions and agencies depending on the United Nation Organization, or other international organizations exempted from customs duties, provided they are for their own use

To get more detailed information about the minimum value subject to PSI or the goods exempted for a country, please refer to the corresponding data sheets available on our website [www.bureauveritas.com/gsit](http://www.bureauveritas.com/gsit)



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## GENERAL PROCEDURE



▶ **In the importing country:**

The process of an importation submitted to an IVP begins in the importing country when importer opens an Import Document at the local authorities or at Bureau Veritas Group Liaison Office (LO), by presenting the proforma invoice for the shipment. He will be given a file reference, which will be used throughout the process. **(1)**

The LO captures this Import Document and transmits it electronically to the corresponding Centre of Relations with Exporters (CRE) in the export or supply country.

▶ **In the exporting country:**

Exporter receives from the CRE a Request for Inspection (RFI) form, which has to be filled in and sent back along with the requested documents such as: product technical specifications, export price list, etc. This form will give details about the goods to be inspected (address, loading of containers, etc.), and about foreseen date of inspection or a projected date. The form should be returned as soon as possible and at least with a minimum of 2 working days before the foreseen date. Every effort will be made to comply with this date. **(2)**

The Bureau Veritas inspector closest to the inspection place will contact the person indicated on the form in order to confirm the appointment and will perform the inspection on the agreed date (see section 5). **(3)**

Exporter should also send to the CRE a copy of the commercial invoice for the shipment and, if necessary, a copy of the transport document. Reception of these documents by the CRE is essential to continue the process. **(4)**

After reception of these documents, the CRE will be able to conclude price verification (see section 7), prepare customs classification and issue the Clean Report of Findings (CRF) or the Non Negotiable Report of Findings (NNRF) in case of discrepancies identified and not corrected. CRF or NNRF issuance sends automatically all data to the LO.

▶ **In the importing country:**

The LO receives electronically the ROF, print it on security paper, sign it and affix an hologram. The document is then secured and may be released to the importer for customs formalities and clearance of goods. **(5)**

In a parallel way, data of ROF issued by Bureau Veritas / BIVAC are sent directly to Customs.



▶ **Objectives of physical inspection:**

To check that the goods presented to inspection conform to those expected by the importer in terms of quality and quantity, that is to say that they conform with the contract, such as proforma invoice or letter of credit.

To check import eligibility, e.g. that the importation conforms with the importing country regulations, in particular for product labelling and shelf-life.

To check that goods are correctly packed with regards to the means of transportation foreseen.

For some destinations, if goods are going to be shipped in container, the inspector should check container condition, witness its loading and affix a Bureau Veritas seal. The number of this seal will appear on the Report of Findings.

Physical inspection may also provide additional information to Bureau Veritas commercial experts to support price verification and customs classification.

▶ **Physical inspection procedure:**

Inspection will take place, whenever possible, in the manufacturer's or supplier's premises, when goods are ready to be sent, that is with its packing. If goods will be shipped on container, physical inspection will take place before stuffing.

Exporter should make sure that goods are presented to the inspector in a satisfactory location, to facilitate a proper inspection and, where applicable, sampling or testing.

The exporter is requested to provide the inspector with reasonable facilities and assistance to handle the goods, including unpacking or repacking, weighing, etc.

In addition to witnessing manufacturer's tests, where applicable, inspector may request copies of the manufacturer's or independent test / laboratory certificates, etc. depending on the product.

Sampling will be taken in accordance with customary quality control procedures, being the seller's responsibility to replace any sample drawn.

Any re-inspection due to an aborted visit by the inspector will be at exporter's expenses.

▶ **Physical inspection results:**

Physical inspection will result in the issuance of an inspection report, counter-signed by the representative of the exporter at the place of inspection.

Discrepancies detected during the inspection will be noted to the exporter, who may rectify them at the time. In case rectifications are done later, a re-inspection at exporter's expenses may be necessary.

It has to be noted that physical inspection results are valid for three months, one month for pharmaceutical or food products.



▶ **Objectives of customs classification:**

Generally, within the scope of government contracts, Bureau Veritas / BIVAC forms an opinion of the customs classification code of the goods to be imported.

The customs classification code determines the tariff rate applicable on the importing country.

▶ **Methodology:**

All information obtained by Bureau Veritas / BIVAC on the goods to be imported, commercial invoice, inspection report, technical sheets, etc. will ensure Bureau Veritas / BIVAC commercial experts to allocate a customs code for each item of the commercial invoice. This job is based on the customs tariff book and rules of classification of the country of importation.

Most of countries use currently the Harmonized Commodity Description and Coding System, generally referred to as "Harmonized System" or simply "HS". It is a multipurpose international product nomenclature developed by the World Customs Organization (WCO). The Harmonized System is governed by "The International Convention on the Harmonized Commodity Description and Coding System". The official interpretation of the HS is given in the Explanatory Notes published by the WCO.

▶ **Objectives of price verification:**

Within the scope of Governments contracts, Bureau Veritas / BIVAC undertakes price verification of the goods to be imported in order to provide an opinion on either **a value for customs purposes** (this value may be used as a basis for the payments of import duties and taxes) or **an export market price** (for government information purposes).

▶ **Methodology :**

The customs valuation methodologies are normally based on either :

- the WTO Agreement on Customs Valuation (ACV) or
- the Brussels Definition of Value (BDV)

The WTO Agreement establishes a Customs valuation system that primarily bases the Customs value on the **transaction value** of the imported goods, which is the price actually paid, or payable, for the goods when sold for export to the country of importation, plus certain **adjustments**.

In cases where the Customs value can not be determined on the basis of the transaction value, it will be determined using one of the following methods:

- The transaction value of identical goods;
- The transaction value of similar goods.

The above valuation methods must be used in hierarchical order. On next page, the questions to be answered by the exporter to enable the valuation of his goods.

Under the Brussels definition of value, the value for Customs purposes shall be the **normal price**, that is to say, the price which the goods would fetch on sale in the open market between a buyer and a seller independent of each other, plus certain **adjustments**.

Currency conversions are calculated using client country published rates.

▶ **Reference publications:**

« Agreement on implementation of article VII of GATT 1994 »  
 « Agreement on Preshipment Inspection »

available on the WTO website: [www.wto.org](http://www.wto.org)

« IFIA code of practice »

available on the IFIA website: [www.ifia-federation.org](http://www.ifia-federation.org)





▶ **Question : Which Bureau Veritas office should I contact to ask for an inspection ?**

Answer : The Centre of Relations with Exporters whose telephone and address are mentioned on the request for inspection. In case you have not yet received this form, please contact the CRE corresponding to your country (\*) and indicate the reference of the import document given by your customer in the importing country.

▶ **Question : Who is paying the inspection fees ?**

Answer : According to the importing country, it will be generally either the government or the importer (\*). Exporter will have to pay only in case of visits in vain of the inspector or re-inspection of the goods.

▶ **Question : Are free of charge goods submitted to inspection ?**

Answer : They should be presented to the inspection and be mentioned on the commercial invoice.

▶ **Question : What happened if my goods are shipped without inspection ?**

Answer : According to the importing country, a destination inspection may be possible, it generally requires a particular request, and the payment of fines. For other countries, shipment can be refused on arrival (\*).

▶ **Question : What happened if the prices on my invoice are adjusted ?**

Answer : The CRE in charge of your file, will contact you in order to inform you and to check that all the necessary elements allowing a correct valuation were sent. The adjusted value will be mentioned on the Report of Findings handed over to your client. It is not necessary to prepare an amended final invoice.

(\*) On our website [www.bureauveritas.com/gsit](http://www.bureauveritas.com/gsit), under "Network Locations", you will find the address and telephone number of the CRE, as well as the name of their managers. You will also find the country data sheets for more detailed information about the PSI programme in that country.

## APPEALS

### If you want to present a complaint or question a decision from Bureau Veritas / BIVAC

In the first instance, please contact the corresponding department manager to state your complaint.

In case your grievance is not resolved, the appeal procedure stated in article 2-21 of the WTO Agreement on Pre-Shipment Inspection (\*) will apply:

You should contact the CRE manager by sending the internal appeal form shown on next page. The CRE manager shall undertake to investigate the dispute and respond to the exporter in writing, normally within two working days of receipt of a fully completed form, by either giving the result of the appeal, with detailed explanations, or advising that further investigation is required and that the result will follow as soon as possible, but not later than within 10 days of receipt of the appeal.

If the grievance is still not resolved, exporters may apply to the Independent Entity, according to article 4 of the WTO Agreement on Pre-Shipment Inspection "Independent review procedure" (\*)

(\*) available on our website.



## Preshipment Inspection Internal Appeal Form

### NOTES:

- A. Exporters with complaints about preshipment inspection (PSI) activities are, in the first instance, requested to discuss the matter with the appropriate department manager of Bureau Veritas office responsible for performing the PSI activity (Centre of Relations with Exporters - CRE). If, following discussions, an exporter is dissatisfied with the result; he is invited to appeal to Bureau Veritas Senior Manager, the CRE manager, by completing and submitting this form.
- B. The CRE Manager undertakes to investigate the grievance and will respond to the exporter, normally within 2 working days of receipt of this form fully completed, by either (a) giving the result of the appeal or (b) advising that further investigation is required and that the result will follow as soon as possible but in any case within 10 days.

(These procedures take into consideration the WTO Agreement on Preshipment Inspection, Article 2.21)

#### 1. EXPORTER

Company Name :

#### 2. EXPORTER'S COMPLAINT DISCUSSIONS

Prior to completion of this form, the complaint should already have been discussed with the CRE office staff. Please advise CRE location :

Address :

Person with whom complaint discussed :

**3. REFERENCE NUMBERS** Inspection Order Reference No.:  
(as advised by CRE or importer)

Telephone No. :

**Contract/Order/Proforma Invoice/Final Invoice No.**  
(delete as applicable)

Telefax No. :

Telex No. :

Contact person :

#### 4. DESCRIPTION OF GOODS

**If you wish to appeal that the action of Bureau Veritas CRE is not in accordance with the WTO Agreement on Preshipment Inspection, please complete Section 5. If not applicable, please proceed to Section 6.**

#### 5. NATURE OF GRIEVANCE WITH BUREAU VERITAS CRE

Please indicate, by marking an "x" in the appropriate box(es) below, which article of the WTO Agreement on Preshipment Inspection ("API") have, in your opinion, not been complied with by the CRE.

Category	API Article No.:	<input type="checkbox"/>	Category :	API Article No.:	<input type="checkbox"/>
* Non-discrimination	2.1	<input type="checkbox"/>	* Delays	2.15	<input type="checkbox"/>
* Site of inspection	2.3	<input type="checkbox"/>		2.16	<input type="checkbox"/>
* Standards	2.4	<input type="checkbox"/>		2.17	<input type="checkbox"/>
* Transparency	2.5	<input type="checkbox"/>	* Price Verification	2.18	<input type="checkbox"/>
	2.6	<input type="checkbox"/>	(For export market	2.19	<input type="checkbox"/>
	2.7	<input type="checkbox"/>	Price : not customs	2.20 (a)	<input type="checkbox"/>
* Protection of Confidential			Valuation purposes)	2.20 (b)	<input type="checkbox"/>
Business Information	2.9	<input type="checkbox"/>		2.20 (c)	<input type="checkbox"/>
	2.11	<input type="checkbox"/>		2.20 (d)	<input type="checkbox"/>
	2.12	<input type="checkbox"/>	* Appeals Procedures	2.20 (e)	<input type="checkbox"/>
* Conflicts of Interest	2.14 (a)	<input type="checkbox"/>		2.21	<input type="checkbox"/>
	2.14 (b)	<input type="checkbox"/>		2.21 (a)	<input type="checkbox"/>
	2.14 (c)	<input type="checkbox"/>		2.21 (c)	<input type="checkbox"/>

Notes : If your grievance :

- (i) Does not concern the above mentioned categories, please proceed to Section 6.
- (ii) Concerns the above mentioned categories and also relates to PSI carried out in a WTO member country of goods for importation into a WTO member country: you are entitled to submit the dispute to an Independent Review, at least two working days after submission of this form to the PSI office, in accordance with Article 4 of the WTO Agreement on Preshipment Inspection. Further details are available from the CRE upon request.



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**6. SUMMARY of GRIEVANCE**

Please advise the facts of the case and summarise the reasons why, in your opinion, the decision or conduct of Bureau Veritas CRE is not acceptable. Please attach copies of relevant documents.

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**7. PROPOSED SOLUTION TO THE GRIEVANCE**

Please state your proposed solution to the grievance.

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**8. EXPORTER'S DECLARATION**

I hereby declare that:

- a. I am an authorised employee of the exporter
- b. The information contained here is, to the best of my knowledge, correct.

FULL NAME: \_\_\_\_\_ POSITION: \_\_\_\_\_

COMPANY NAME: \_\_\_\_\_

SIGNED \_\_\_\_\_ DATE: \_\_\_\_\_

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Please return this form to the CRE responsible for performing the Preshipment inspection activity.

