C/O Tripartite Committee (Ref. Civil Society)
Economic Commission for Latin America and the Caribbean (ECLAC)
1825 K Street NW, Suite 110
Washington, D.C. 20006

Dear Sir:

This refers to the Open Invitation to Civil Society in FTAA Participating Countries and to the Toronto meeting of the Fifth trade Ministerial Meeting held on November 4, 1999. We submit the attached Cover Sheet and our comments below:

Our comments relate to market access, and specifically to market access in Argentina:

Argentina requires pre-shipment inspection by SGS, Veritas, etc. This process causes a lengthily waiting period by the Argentine customer. In addition, the shipper must supply a certificate of origin and this document must go to the Argentinean Consulate for legalization. An additional waiting time is required. Certificates of origin must be letter perfect. If one letter is out of place or an obvious error is made in typing, the certificate it is rejected and the shipper must start all over again. In the meantime the Argentine customer cannot obtain their goods and the face demurrage charges or fines. For example, a recent certificate showed a date of 12-19-00 when it should have been 12-19-99. At the time this was received it was obvious that this was a typographical mistake. But the shipper had to begin again.

Very few countries require pre-shipment inspections. This along with the perfection required in providing the information are tools for delaying imports into Argentina so that the Argentinean customer becomes discouraged and decides not to import the product.

We view these encumbrances as efforts by the Argentine government to choke off imports with measures that are not used by most of the world community. Before an agreement is made to create FTAA this type of practice should be terminated. Argentina should conduct their import requirements with the same lack of harassment afforded their shipments to other countries and the United States.

ALMERICA OVERSEAS, INC.

Gordon Lawless, Member of SAC#9