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## Important Amendments to Annex 24 of Mexico's General Rules for International Trade (Inventory Control System for the Business Certification Program)

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On October 15, 2024, the Second Resolution of Amendments to the General Rules of International Trade for 2024 and Annexes 1, 2, 5 and 24 was published in the Official Journal of the Federation, through which important changes were made to the Company Certification Program (Esquema de Certificación de Empresas).

Aside from opining on the merits of the relevant changes of said amendments, the changes to Annex 24 of the General Rules of International Trade are particularly noteworthy. Such changes create a new section C specifying the minimum information that must be included in the Inventory Control System for companies that are Registered in the Company Certification Program, including VAT and IEPS Certification, Authorized Economic Operator, and Certified Commercial Partner Certifications.

Note that the amendments to Annex 24 were previously announced through the publication of the First Advance Version on October 7th.

By creating this new section, specific deadlines are established for certified companies to electronically send their inventory control information to the Tax Administration Service (48 hours after the importation or return customs operation and accompanying information no later than the time of liquidation of the corresponding customs declaration).

Likewise, the amended version of Annex 24 establishes the obligation for certified companies to provide the Tax Administration Service, in writing, the username and password of their inventory control system to enable the authorities to carry out constant and real-time monitoring of international trade operations related to their certification, to monitor compliance with customs obligations and verify the integrity of the information contained therein.

This implies that through continuous monitoring of operations, the Tax Administration Service will be able to know the information of the certified company's inventory control system in real time, which will support it in carrying out inspection procedures.

It is important to note that in accordance with the Fourth Transitory Article of the amendments, certified companies must comply with the new obligations established in Annex 24 within one month following the date of entry into force of these new rules, that is, no later than November 15, 2024.

These major new changes could include certain elements that infringe the rights of certified companies, which would give rise to such companies having legal defenses that could be analyzed, in accordance with the facts of each certified company's case.

In any event, it is of utmost importance that during the period prior to the enforceability of these obligations, certified companies operating under the above programs should take all necessary actions to ensure that they fully comply and, as appropriate, prepare for the implementation of the new rules. At CCN, we have a seasoned international trade team who are available to discuss any questions you may have in relation to this matter.