

New Guidelines for the Land Transportation of Hydrocarbons in Mexico

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On September 23, 2025, the "Decree by the National Energy Commission issuing General administrative provisions establishing the Guidelines for the beaconing and technical requirements that must be met by the global positioning system of vehicular units registered under permits for the transportation or distribution of petroleum products, liquefied petroleum gas and petrochemicals by means other than pipelines" (the "Decree") was published in the Official Journal of the Federation by the National Energy Commission ("CNE" for its Spanish acronym).

As mentioned in the preamble of the Decree, the reason behind these new guidelines is to implement preventive actions to combat crime in the hydrocarbons sector, considering that these measures will allow Mexican authorities to clearly identify and continuously monitor vehicles transporting hydrocarbons in Mexico.

The purpose of the Decree is to establish the specific requirements that must be met by vehicles (including tankers, tank cars, delivery vehicles, semi-trailers, and tractors) associated with permits for the transportation or distribution of petroleum products, liquefied petroleum gas and petrochemicals by means other than pipelines ("Permits"). Such requirements can be summarized as follows: i) for the beaconing, which identifies the activity permitted by CNE, and ii) for the characteristics that must be met by the GPS implemented in such. It is important to note that any vehicles under a Permit may not be simultaneously linked to another permit.

In connection with the obligations related to the beaconing of the vehicles, each unit associated with a Permit must display an integral and permanent label, which must include a QR code issued by CNE, that complies with the following characteristics: i) it must be weather resistant and last at least 5 years; ii) it must be visible both day and night; iii) it must have resistance to the action of chemical or mechanical agents; and iv) it must have the dimensions and code established in the Decree.

Moreover, the QR code must be readable by standard mobile devices, so that CNE and other Mexican competent authorities may verify through their online informatic systems, the legitimate ownership, possession and origin of the transported hydrocarbons, the validity of the Permit, and traceability of the transported products.

In relation to the QR code, current Permit holders should have requested the QR and their updated Permit to the CNE within 15 business days after the entry into force of the Decree (which was the day following its publication), while for new Permit holders, the QR will be provided by CNE within the exhibits of the Permit. In any case, once Permit holders submit their requests, the CNE should issue and notify the QR code and the updated Permit within 45 business days after receiving all needed and requested information.

On the other hand, in connection with the GPS, all vehicles subject to a Permit must have and maintain an active and valid GPS system which allows the monitoring and geolocation in real time of the vehicles at all times. Considering the foregoing, Permit holders are obligated to report as soon as possible, but not later than 48 hours after its occurrence, any failure, disconnection, alteration or loss of the GPS, as well as take any necessary corrective actions.

Additionally, Permit holders must allow remote access and deliver historical records, as well as the recordings in real time, as to the location, trip itinerary and operative status of the vehicles associated with the Permit. Furthermore, Permit holders must keep the recordings generated by the GPS system for at least 12 months following their generation.

All GPS systems must comply with the following characteristics: i) it must have an open and documented API application programming interface that allows its integration with CNE's monitoring platforms, and at a minimum transmit geographic location, speed, direction, engine start-stop events, and security alerts; ii) it must have international quality and safety certifications; iii) it must have local storage that allows for at least 72 hours of data in case of a loss of connectivity, and data transmission must be carried out in real time, with a minimum frequency of every 30 seconds, and the provider of the GPS system must guarantee a minimum monthly availability of 99% of the service; and iv) the system must allow remote, continuous and unrestricted access by CNE and Mexican authorities.

In any case, the Decree is of general and mandatory application for all permittees who hold a valid Permit and carry out these activities. Any breach of the obligations contained therein could be subject to fines and sanctions, including the revocation of Permits in severe or repeated cases of non-compliance.

Please feel free to contact us if you have any questions regarding the Decree or with any of these new requirements