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# UNITED NATIONS INDUSTRIAL DEVELOPMENT ORGANIZATION - UNIDO

Verification report in accordance with procedures agreed upon

As of December 31, 2005



### To: UNITED NATIONS INDUSTRIAL DEVELOPMENT ORGANIZATION - UNIDO

Regarding with our review of the annual verification audit of multi-year agreements in Venezuela as part of the National Phase-Out Plan for Venezuela, and verifying the Article 7 consumption data of CFCs in Venezuela during the year 2005, we are showing this report. The purpose of our work by means of application of agreed-upon procedures was to carry out review procedures, which we have agreed upon with UNIDO and any involved third parties. We were not engaged for, and we did not conduct an audit, which purpose would be to express an opinion on specific elements, accounts or items of the financial statements. Thus, we do not express an opinion on the specific elements, accounts or financial statements. Had additional procedures been carried out, our attention could have been drawn to other issues that would have been reported.

The purpose of this report in accordance with procedures agreed upon with UNITED NATIONS INDUSTRIAL DEVELOPMENT ORGANIZATION - UNIDO as of December 31, 2005 of the PROJECT is solely for the aforementioned specific users and should not be used by others who are unaware of the applied procedures and who did not assume the responsibility for the adequacy of same.

NAVEDA, CASTILLO & ASOCIADOS

CONSULTORES ASOCIADOS

Hic. Juan de Dios Naveda Public Accountant

C.P.C. Nº 7.431

Caracas, December 15, 2006

## UNITED NATIONS INDUSTRIAL DEVELOPMENT ORGANIZATION - UNIDO

VERIFICATION REPORT IN ACCORDANCE WITH PROCEDURES AGREED UPON WITH UNIDO, AS OF DECEMBER 31, 2005

### AGREED-UPON PROCEDURES

The objective of our work consisted in the performance of procedures agreed upon with UNITED NATIONS INDUSTRIAL DEVELOPMENT ORGANIZATION - UNIDO for the period ended December 31, 2005.

The procedures agreed upon with UNITED NATIONS INDUSTRIAL DEVELOPMENT ORGANIZATION - UNIDO are as follows:

- Review the government policy controlling ODS consumption and production, and the division of responsibility between national institutions for enforcing the relevant policies;
- Review the government statistics on ODS imports and exports against the data from the customs and
  the amount of quota issues against actual quota applied;
- Review the list of government authorized importers and exporters against the records of the customs;
- Review on a representative sampling basis if necessary, the records of importers/exporters against the
  customs records and the quota issued;
- Review the plan of action proposed by the Government to implement the recommendations from the auditors.

#### AUDIT PROCEDURES APPLIED

Our verification audit of multi-year agreements in Venezuela as part of the National Phase-Out Plan for Venezuela, and verification of the Article 7 consumption data of CFCs in Venezuela during the year 2005, included the audit procedures as follows (These are the procedures carried on by this date):

- 1. We carried on interviews with FONDOIN President and others authorized officials in order to know about FONDOIN activities, structure and procedures.
- 2. We reviewed and filed the National Government Policy regarding CFCs control. The Government policy is supported by Laws, Decrees, Resolutions, and other legal instruments.
  - 2.1. We got copies of such Laws, Decree and Resolutions.
  - 2.2. We reviewed the creation Decree of the Fondo Venezolano de Reconversión Industrial y Tecnológica – FONDOIN.
  - 2.3. Reviewed of the division of responsibility between national institutions for enforcing the relevant policies.
- 3. FONDOIN made the appointments in order to perform the corroborative interviews with responsible personnel of National Customs in the Servicio National Integrado de Administración Aduanera y Tributaria SENIAT, (National Customs Management), and Ministerio de Ambiente y Recursos Naturales (MARN) Ministry of Environment and Natural Resources, regarding to:
  - 3.1 Verification of procedures and standards regarding with reception of ODS.
  - 3.2. Verification of import, export and production statistics.

- 3.3. Review of the 2005 government statistics on ODS imports and exports.
- 3.4. Review the list of government authorized importers and exporters against the records of the customs.
- 3.5. Review on a representative sampling basis if necessary, the records of importers/exporters against the customs records and the quota issued.
- 4. We made comparisons between 2005 imports, exports and consumption of ODS, according with the National Statistics Institute (Instituto Nacional de Estadísticas INE), and the requirements established by Decree 3228.
- 5. On a sample basis we reviewed completed activities reported by FONDOIN to UNIDO, on its progress and interim reports, based on disbursement vouchers, documents, reports, etc.
- Review of production data at PRODUVEN.

### SUMMARY OF OBTAINED RESULTS

A. REVIEW THE GOVERNMENT POLICY CONTROLLING ODS CONSUMPTION AND PRODUCTION, AND THE RELEVANT POLICIES.

### BACKGROUND

At its 43rd Meeting, the Executive Committee of the Multilateral Fund for the Implementation of the Montreal Protocol agreed to approve, in principle the national CFC phase out plan for the Venezuela at a total level of funding of US\$ 6,240,554 (excluding agencies support costs) as the total funds that would be available to the Government of the Venezuela to achieve its commitments for the complete phase-out of CTC and TCA used in the country witch UNIDO as the lead implementing agency.

In accordance with the agreed conditions for Phase-out of CFCs in Venezuela the initial approval was made in April 2004:

Table 1: Consumption data agreed for the National Phased out Plan

PROJEC	T DATA	2004	2005	2006	2007	2008	2009	2010
	Montreal Protocol Limits	3,322.0	1,661.0	1,661.0	498.0	498.0	498.0	0.0
CFCS	Annual consumption limit	3,262.0	1,661.0	1,661.0	400.0	400.0	0.0	0.0
(ODP	Total demand (reference)	1,650.3	1,400.5	1,200.5	765,4	515,4	415,4	110.0
tonnes)	Annual phase-out from ongoing projects	100	200.0	0	0.0	0.0	0.0	0.0
	Annual phase-out newly addressed	0.0	50.2	200.0	435.0	250.0	100.0	305,4
	Annual unfounded phase-out	-	-	-	-	•	-	-
TOTAL C	TOTAL ODS CONSUMPTION TO					j		
BE PHAS	BE PHASED OUT		250.2	2000	435.0	250.0	100.0	305.4
Total OD	Total ODS consumption to be phased in (HCFCs)			1.8	-	_		•
Project c	Project costs (US\$)							
Funding f	Funding for UNIDO		1,631,831	2,071,831	641,831			
Total Pro	Total Project funding		1,631,831	2,071,831	642,831			
Support cost								
Support cost for UNIDO		142.130	122,387	155,387	48,137			
Total support costs		142.130	122,387	155,387	48,137			
TOTAL	OST MULTILATERAL FUND US\$)	2,037,191	1,754,218	2,227,218	689,968			

- 3. Law of Hazard Substances, Material and Disposal. Official Gazette Nº 5554, Extraordinary, November 13, 2001.
- 9. Decree Nº 3220 "Standards to Reduce the Ozone Depleting Substances". Official Gazette Nº 5293, Extraordinary, January 26, 1999.
- 10. Decree № 989 "Customs Fees". Official Gazette № 5039, Extraordinary, February 6, 1996.
- 11. Decree Nº 3228 "Standards for Regulations and Controlling the Production, Importation, Exportation and Use of the Ozone Depleting Substances". Official Gazette Nº 5737, November 11, 2004.
- 12. Decree No 4335 "Standards for Regulations and Controlling the Production, Importation, Exportation and Use of the Ozone Depleting Substances". Official Gazette No 38.392, March 11, 2006.

For the Audit Report, we considerer the Decree No 3228:

The purpose of this Decree is to enact the rules to control and to regulate production, import, export and consumption of the ozone layer depleting substances; as well as the mechanisms for import, export and safe handling of such substances. These Decree established:

- a. The forbidden of installation of new plants for production of SAOs.
- b. The registration in the Ministry of the Environment and Natural Resources of companies which manufacture materials and equipments using or containing any of Ozone Layer Depleting Substances.
- c. Approval of the Ministry for the Environment and of Natural Resources for final disposition or destruction of any depleting substances.
- d. The Ministry of the Environment and of Natural Resources shall perform visits, supervisions and proofs that might be necessary to verify the adequate compliance with the dispositions contained in this Decree.
- e. The Ministry of the Environment and of Natural Resources shall present a Technical Specifications Guide, in which there shall be determined the conditions for storage, recovery, recycling, re-usage and destruction, of the ozone layer depleting substances.
- f. The National Commission on the Environmental Technical Standards, created through Decree No. 2.014 dated 26th September, 2002, shall proceed to the evaluation of the technical dispositions from the current Decree, within a lapse not greater than three (3) years, starting from its publication in the Official Gazette from the Bolivarian Republic of Venezuela, in order to verify its accordance with the socioeconomic, environmental and health reality of the country.
- g. Revoke the Decree No. 3.220 dated 13th January, 1999.

### VENEZUELAN INDUSTRIAL AND TECHNOLOGICAL RECOVERSION FUND - FONDOIN

The Venezuelan Industrial and Technological Re-conversion Fund (FONDOIN), was created by Government Decree in October 20, 1992 (Decree Nº 2590, Official Gazette Nº 35073). FONDOIN is a non-profit foundation depending of the Production and Commerce Ministry. Its main objective is to promote and conduct the require actions in order to substitute and phase-out the Ozone Depleting Substance (ODS) through the re-conversion of industries that still use these products, the implementation of the best practices in service sector, supporting and coordination of awareness and training of the public and private sectors, and the adequacies of Venezuela's regulations in order to achieve the Montreal Protocol stipulations and its amendments.

### The main activities of the Foundation are:

- 1. Identification of manufacturing companies of refrigerants, polyurethanes foams and solvents that deplete ozone, which fill requirements of Multilateral Fund to achieve its re-conversion.
- Following-up of the ongoing re-conversion programs to fill previous Executive Committee approved objectives.
- 3. Monitoring exports, imports, production and consumption of the ODS according with Montreal Protocol authorized list of substances.
- 4. To promote coordination actions with government organizations responsible for the fulfillment of national laws regarding with the protection of the ozone. Carry on training programs, technical standards, publications, and others actions.
- 5. Development of divulgation and education media campaigns regarding ozone depleting issue, appropriate handle of substances and its substitutes.
- 6. Participating in the activities promotes by Latino American Network of Ozone Unites, the Executive Committee and Protocol of Montreal parts.

FONDOIN is located at Avenida Libertador, Centro Comercial Los Cedros, Piso 5, La Florida. Caracas, DC. Venezuela. Phones: +58 212 731.39.32 / 731.29.92. Fax: +58 212 731.00.15. The web site is www.fondoin.org

### NATIONAL LAWS AND REGULATIONS

The Venezuelan Laws and Regulation regarding the ozone depleting substance are:

- Constitution of the Bolivarian Republic of Venezuela, December 1999.
- 2. Vienna Convention for the Ozone Protection. Official Gazette Nº 34818, July 19, 1988.
- 3. Montreal Protocol of Ozone Depleting Substance. Official Gazette No 34134, January 11, 1989.
- 4. London Amendment of the Montreal Protocol. Official Gazette Nº 4580, Extraordinary, May 21, 1993.
- 5. Copenhagen Amendment of the Montreal Protocol. Official Gazette No 5180, November 4, 1997.
- 6. Montreal Amendment of the Montreal Protocol. Official Gazette No 37217, June 12, 2001.
- 7. Organic Customs Law. Official Gazette No 5353, Extraordinary, January 3, 1992.

B. REVIEW THE GOVERNMENT STATISTICS ON ODS IMPORTS AND EXPORTS AGAINST THE DATA FROM THE CUSTOMS AND THE AMOUNT OF QUOTA ISSUES AGAINST ACTUAL QUOTA APPLIED.

### REVIEW OF GOVERNMENT STATISTICS ON 2005 IMPORT, EXPORT, AND PRODUCTION OF ODS.

We reviewed the Government data, namely INE latest statistics in order to make comparisons with, restrictions and quotas established by Decree 3228, as well as PRODUVEN data. The following table shows the summary.

Table 2: Statistics on 2005 Production, Imports, Exports and Calculated level of Consumption.

ODP tormes	Import	Total production	Feedstock use	Calculated production	Exports	Consumption
R-11	0.0	248.2	192.0	56.2	67.6	-11.4
R-12	0.0	2,203.2	0.0	2,203.2	533.1	1,670.0
R-113	0.0	0.0	0.0	0.0	8.8	-8.8
R-115	0.0	0.0	0.0	0.0	0.1	-0.1
CFC	0.0	2,451.4	192.0	2,259.4	609.5	1,649.8

Table 3: INE Latest Records CFC-11 exports during 2005.

EXP	ORTA	CIONES ENERO-DICI	EMBRE 20	005			
Año	Nom mes	Arancel y Descripción	Nombre del País	Peso Bruto SUM	Peso Neto SUM	Bolivares SUM	Dolares SUM
2005	ENERO	2903410000 TRICLOROFLUOROMETANO	COLOMBIA	42.410	37.520	126.671.327	66.140
2005	ENERO	2903410000 TRICLOROFLUOROMETANO	CUBA	2.330	2,000	8.043.840	4.200
2005	ENERO	2903410000 TRICLOROFLUOROMETANO	ECUADOR	3.798	3.360	14.157.159	7.392
2005	MAYO	2903410000 TRICLOROFLUOROMETANO	CUBA	2.912	2.500	12.867.600	6.000
2005	ЛИИІО	2903410000 TRICLOROFLUOROMETANO	COLOMBIA	19.820	18.200	74.713.575	34.838
2005	OIMUL	2903410000 TRICLOROFLUOROMETANO	CUBA	6.920	4.000	18.872.480	8.800
		Total	L		67.580		

Erri O	RIACIOI	IES ENERO-DICIEMBRE 2005	1	Peso	Peso		
Año	Nom mes	Arancel y Descripción	Nombre del Pale	Brute SUM	Neto SUM	Bolivares SUM	Dolares SUM
		2903420000					1
2005	ENERO	DICLORODIFLUOROMETANO	COLOMBIA	31.271	25.198	146.359.584	76.420
		2903420000					
2005	ENERO	DICLORODIFLUOROMETANO	CUBA	11.760	8.000	30,643,200	16.00
	<u> </u>	2903420000					
2005	ENERO	DICLORODIFLUOROMETANO	ECUADOR	49.121	34.169	187.697.262	98.00
		2903420000					
2005	FEB.	DICLORODIFLUOROMETANO	CUBA	35.640	29,920	134.661.542	70.31
		2903420000	PANAMA(EXC	l			
2005	FEB.	DICLORODIFLUOROMETANO	CANAL)	42.240	31,200	125,483,904	65,520
		2903420000				1	
2005	FEB.	DICLORODIFLUOROMETANO	PARAGUAY	27.540	23.120	94,536,187	49,361
		2903420000	PANAMA(EXC				<u> </u>
2005	MARZO	DICLORODIFLUOROMETANO	CANAL)	17.550	11.700	52.692.822	24.57
		2903420000	PANAMA(EXC				
2005	MAYO	DICLORODIFLUOROMETANO	CANAL)	9.594	7.876	53.711.815	24.817
008E		2903420000	REP	1.4.00		140 420 200	
2005	MAYO	DICLORODIFLUOROMETANO	DOMINICANA	15.436	11.905	140.426,263	65.479
2005	110114	2903420000	GIID A	10.200	6000	20 229 260	
2003	סואטנ	DICLORODIFLUOROMETANO	CUBA	10.380	6,000	30,238,860	14.100
2006	IIDIIO	2903420000	POLLADOR	14.894	11 000	22 646 882	00.00
2003	OINUL	DICLORODIFLUOROMETANO	ECUADOR	16.574	11.970	72.656.903	33.879
2005	unua	2903420000	REP	46 000	78 771 8	431 300 034	106.400
2003	סואטנ	DICLORODIFLUOROMETANO 2903420000	DOMINICANA	45.808	35.715	421.280.934	196,438
2045	400	DICLORODIFLUOROMETANO	COLOMBIA	67.173	51.747	482.657.242	224.045
4003	AGO.	2903420000	REP	97,173	31.747	404.037.444	225.057
2005	AGO.	DICLORODIFLUOROMETANO	DOMINICANA	30.872	23.810	280.854.671	130.959
2003	AOO.	2903420000	BOMINIOINIA	20.074	25.010	200.054.071	130.939
2005	SEPT.	DICLORODIFLUOROMETANO	COLOMBIA	70.798	49.872	585.739.586	273.123
2000	WEST L.	2903420000	COLOMBIA	70,720	47.074	200,737,200	475,145
2005	SEPT.	DICLORODIFLUOROMETANO	PERU	19.110	13.000	189,582,640	88.400
		2903420000	REP				201777
2005	SEPT.	DICLORODIFLUOROMETANO	DOMINICANA	11.204	8.641	101.926.404	47.527
		2903420000					
2005	OCT.	DICLORODIFLUOROMETANO	COLOMBIA	22,050	15.000	161.617.056	75.360
		2903420000	PANAMA(EXC				
2005	OCT.	DICLORODIFLUOROMETANO	CANAL)	21.120	15.600	187.352,256	87.360
		2903420000					
2005	OCT.	DICLORODIFLUOROMETANO	PARAGUAY	18.370	14.960	81.760.730	38,124
		2903420000		]			
2005	NOV.	DICLORODIFLUOROMETANO	COLOMBIA	23.520	16.000	201.695.341	94.048
		2903420000	REP				
2005	NOV.	DICLORODIFLUOROMETANO	DOMINICANA	30.078	23.198	273.635.948	127.593
		2903420000				]	
2005	DIC.	DICLORODIFLUOROMETANO	COLOMBIA	42.930	29.920	440.876.145	205,575
		2903420000					
2005	DIC.	DICLORODIFLUOROMETANO	PERU	28.514	19,476	211.959.396	98.834
ſ		2903420000	REP	Ì	Į	T	
2005	DIC.	DICLORODIFLUOROMETANO	DOMINICANA	19.583	15.104	178.091.873	83.042
1	· <del>-</del>	Total			533.101		





Table 5: INE Latest Report: CFC-113, CFC-114/115 exports during 2005.

EXI	ORTA	ACIONES ENERO-DICIEM	<b>1BRE 2005</b>	;			
Año	Nom Mes	Arancel y Descripción	Nombre del Pais	Peso Bruto SUM	Pero Neto SUM	Bolivares SUM	Dolares SUM
2005	MAYO	2903430000 TRICLOROTRIFLUOROETANO 5 (CFC-113)	CUBA	24,549	10,992	128.624,530	54,976
2005	ABRIL	2903440000 DICLOROTETRAFLUOROETANOS Y CLOROPENTAFLUOROETANO (CFC-114 AND CFC-115)	COLOMBIA	230	220	1.700,668	793

### C. REVIEW OF THE LIST OF GOVERNMENT AUTHORIZED IMPORTERS AND EXPORTERS AGAINST THE RECORDS OF THE CUSTOMS.

### IMPORTERS AND EXPORTERS

Table 6: List of authorized importers and exporters.

In ODP tonnes	Quota of import	Imported Amount	Quota of export	Exported amount
1. Refri Electric Shop, C.A.	0	0	0	0
2. Refriquim, C.A.	0	Ö	0	. 0
3. Interfrigo de Venezuela, C.A.	0	0	0	0
4. Productos Halogenos de Venezuela, C.A (PRODUVEN)	0	0	0	600,681
5. Dupont Química de Venezuela, C.A.	0	0	0	0
6. Elga de Venezuela, C.A.	0	0	0	0
7. Falop, C.A.	0	0	0	0
8. Corporación Saira, C.A.	0	0	0	0
Refrigeración Master Metropolitana,     C.A. (REFRIMASTER)	0	0	0	0
10. Distribuidora Quimisol, C.A.	0	0	0	0
11. Boc Gases de Venezuela, C.A.	0	0	0	0
12. Exposire	0	0	0	0
13. Exporters of CFC-113,CFC- 114/CFC-115 (R-502) not known*	0	0	0	8.9
Total	0	0	0	609,541

. Sor far, Auditor is not able to access the information of exporters in INE.

### **CUSTOMS**

Table 7: List of customs with CFC trade.

CFC, ODP tonnes	Import data	Export data
1. Puerto Cabello	0	366,018
2. El Guamanche (Valencia)	0	0.066
3. La Guaira	0	0
4. San Antonio del Tachira	0	243,457
Total	0	609,541





### D. REVIEW THE PLAN OF ACTION PROPOSED FOR THE GOVERNMENT TO IMPLEMENT THE RECOMMENDATIONS FROM THE AUDITOR FOR 2005 DATA.

Recommendation 1: According with Article N° 31 of Decree 3220, and Article N° 37 of Decree 3228, the officers of the MARN, can make the necessary visits and inspections to accomplish dispositions of this Decree.

### Review:

It is possible to state that according to I articulate N - 37 of decree 3228, the Ministry of the Environment has total knowledge of the dispositions established in this decree and is fulfilling it.

Recommendation 2: We were informed during our visit to MARN that no visits were performed during 2004 year.

#### Review:

For year 2004 it was in use decree 3220 dated 13/01/1999, taking place for then three inspections to the import companies of exhausting substances of the ozone layer giving in certain form fulfillment to I articulate 31 of the indicated decree, in order to verify the amounts granted by the Ministry, as well as the productive process.

During the year 2005, based on the decree 3228, articulate 37; eight (08) inspections were made and in during the year 2006, twenty (21) inspections, have been made.

Recommendation 3: Our recommendation is that MARN, FONDOIN, National Guard and SENIAT perform this kind of official visits and inspections, in order to accomplish these legal dispositions.

### Review:

The Ministry of the atmosphere works in coordination with the National Guard making the visits that consider necessary according to the power which they have.

As far as FONDOIN, they do not have competition to make the inspections in relation to the SENIAT is incumbent on to him what the import manifestos of and export correspond to verification of.

Recommendation 4: Due to recent catastrophically events (Hurricanes, tornados, earthquakes, and hard rains) in Venezuela there is a collective concern regarding the climatic change issue. Because of this, there is a good chance to make coordinated activities with government institutions in order to promote between them, the NPP and reach their goals. It is our opinion, based on our visits, interviews and meetings, that there are efforts from different government's institutions to accomplish with NPP, but they are not integrated as a team and this situation do not allow evaluating efficiently and reports all reached goals and their performance.

### Review:

A good opportunity appears to establish an effective coordination and combines with the different organisms, is convenient to name a governing being for this aim.

### c. COMPLEMENTARY INFORMATION

The importers authorized directly by the MARN, that authorizes leave to the import companies are the following ones:

### **AUTHORIZED IMPORTERS**

- PRODUVEN, C.A.
- 2. FALAP, C.A.
- COMERCIAL SAN ANTONIO, C.A.
- 4. INTERFRIO DE VENEZUELA, C.A.
- 5. REFRIMASTER, C.A.
- 6. BOC GASES DE VENEZUELA, C.A
- 7. SINTESIS, C.A.
- 8. CORPORACION SAIRA, C.A.
- 9. ELGA DE VENEZUELA, C.A.
- 10. EXPOAIRE, C.A.
- 11. REFRIELECTRIC SHOP, C.A.
- 12. REFRI QUEEN, C.A.
- 13. DUPONT QUIMICA DE VENEZUELA, C.A
- 14. DISTRIBUIDORA QUIMISOL, C.A.

Of the registries and controls that are maintained in the ministry of the environment as well as in the visited customs we verified that during year 2005, there was no import of CFCs, we verified that the only authorized exporter company is Productos Halogenados de Venezuela, C.A (PRODUVEN). For the cases of export and import, FONDOIN does not have this type of authorization in the country, and only the ministry of the environment is of the authority that administers to these permissions according to the regime of import or export of each instance.

### F. COMMENTS AND RECOMMENDATIONS

- For the aims to guarantee a trustworthy handling of the information it is important that the different organizations create the suitable technological platform.
- The strict fulfillment of the established effective norms for the control of the consumption, production and export of CFC, have an impact in the national market of these products.
- The difficult access to the sources of intelligence, particularly to agents of the organization, prevents the speed in the delivery of reports
- The access to the sources of intelligence is excessively bureaucratic.

- By commentaries received unofficially, there is a contraband margin difficult to quantify, but that, of one or another form, harms the system of control of customs.
- For a better control of the consumption of the substances CFC for the year 2006 is recommended to run an internal audit before the 12/31/2006.
- To determine a margin of additional consumption for the substances that could enter into the country by way of smuggling.
- It was too slow to select the auditor hired for the audit of the data in the concluded period 12/31/2005.
- Final recommendation, not just by an audit the CFCs consumption can be determined; scientific applications are recommended, since even though it is true that there are lower consumption levels, it is also certain that the depleting of the ozone layer keeps going on.

23430000000 2303200000 2303230000 2303400000 2403410000				Todas	Todas Meses	
28						
2 8			Kilos Brutos	Kilos Neros	Bolivares	Colares
8	28030000000 DEPLACIOS HALLOGENADOS	S DE LOS HIDROCARBUROS	୯୭ ଜଣ କଃ ୫ ୍	67E.119.05	5,515,622,843.0.0	2.631,079,00
	Servados pionauda no satura	Der vedes cibrados no seturados de los hidrocarburos acíclicos.	937,00	350,05	100,090,000	29566
	Tatractoroauteno (perchomenteno)	neno)	336.60	330.00	100 C3C 3V8	343.00
	SI YEAR		830.00	350.03		00/967
1	Lista vidos natega nados de los diferencias e contos.	os to drociameros acióndos con dos harogenes	10 C		10 10 10 10 10 10 10 10 10 10 10 10 10 1	
•			00.400.00			DALEGE TEC.
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RIF: J-30382607-5

NIT: 0075887043

Habilitado:

No.: 1294 Solicitud de Información

Fecha: 03/01/2007

Cliente: 1044

NAVADA CASTELLANOS Y ASOCIADOS

Tipo: EMPRESA

Categoria: NACIONAL

Departamento.:

Contacto.: JUAN

NAVEDA

Dirección.: EDF MORICHAL PISO 13 OFIC 13-C AV SUR 3 ESQUINA DE ZAMURO

Sector: PRIVADO

Como solicita la información: PERSONAL

E-Mail: NAVEDACASTILLO@HOTMAIL.COM

Responsable: ONEIDA NIEVES

Teléfono:

5802125419262

Fax: 5802125419262

**SERVICIOS** 

DESCRIPCION

DISQUETES

EXPORTACIONES AÑO 2005 DEL COD 2903

Observaciones:

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Señores COMISION DE ADMINISTRACION DE DIVISAS (CADIVI) CARACAS Su despacho.-

Por medio de la presente, Yo, Juan de D	POS MOVEDA., titular
de la Cédula de Identidad No. 649.94	5, hago constar y
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disposiciones de la Ley Contra los Ilícitos Cam	biarios; que en su contenido
expresa:	

"Las personas naturales o jurídicas que importen o exporten divisas, desde o hacia el territorio de la República Bolivariana de Venezuela, por un monto superior a diez mil dólares de los Estados Unidos de América (US \$ 10.000,00 o su equivalente en otras divisas, están obligadas a declarar ante la autoridad administrativa competente, el monto y la naturaleza de la respectiva operación".

En consecuencia, reconozco y acepto que soy el único responsable por el cumplimiento de las disposiciones de dicha Ley, eximiendo expresamente a Mail Boxes Etc. de cualquier responsabilidad por la contravención a la misma.

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Atentamente,

Nombre de la Compañía

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ORIGINAL CLIENTE

Please find the answer to the questions raised by the Secretariat of the Multilateral Fund from the Audit prepared by Naveda Castillo & Asociados.

a. Are there regulatory procedures for ODS data collection and reporting in place?

The following articles of Decree 4335 are related to the query.

1

Article 11: "The Companies registered as producers and/or exporters of the ozone depleting substances, in its pure form or mixtures must report within the first 10 days of each semester to the Ministry of the Environment, the production figures, local sales, exports and stock, as well as imported and consumed amounts and total used as a raw material in the production process."

Article 15: "The company have to present to the Ministry of the Environment the following documents to process an import request: Certification of the imported amounts during the previous semester, by type of substance and package, properly certified by the customs of the port of entrance from the merchandise to the country."

Article 24: "The Ministry of the Environment will keep statistic control of the registered substances of the Annex A, B, C and E produced, imported, exported, recovered, recycled, reclaimed and/or destroyed in the country."

These three articles indicate that there is an obligatory procedure for provision of the data. Since this is not automatic process many faults occur, the systems of the Ministry of Environment are not interconnected with the Customs. This situation is being corrected, but unfortunately until the correction has not been finished, it will continue depending on the companies and the possibility of the Ministry to visit them to obtain or confirm the data and to be able to compare it with the Customs registers.

b. Are permits required for the import or sale of bulk ODS?

The import in bulk is not prohibited whenever the limits are not exceeded and the import is made by a registered Company whose request of import has satisfied all the requirements.

c. Is there a quota system in place for import of bulk ODSs?

The import quotas are applied case by case, base on the following: the request of the importer, previous import and that the amount does not exceed the total limit. Considering the rights of the other importers, it does not matter if it will bring the product in ISO tanks or small cylinders, whenever they are re-loadable.

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ORIGINAL CLIENTE