



we wear™ global markets

September 27, 2012

Ambassador Ron Kirk
United States Trade Representative
Office of the United States Trade Representative
600 17th Street, NW
Washington, DC 20508

**RE: FR Notice Volume 77, No. 171 Page 53959 (September 4, 2012) –
Request for Comments on WTO Dispute Settlement Proceeding Regarding
Argentina – Measures Affecting the Importation of Goods.**

Docket Number: USTR-2012-0023.

Dear Ambassador Kirk:

On behalf of the American Apparel & Footwear Association (AAFA), I am submitting the following comments in response to the request for public comments by the Office of the United States Trade Representative (USTR) on the issues concerned with the August 21, 2012 request for consultations with the Government of Argentina by the Government of the United States under the Marrakesh Agreement Establishing the World Trade Organization (“WTO Agreement”).

AAFA is the national trade association representing apparel, footwear, and other sewn products companies, and their suppliers, which compete in the global market. Our membership consists of 380 American companies which represent one of the largest consumer segments in the United States. The apparel and footwear industry overall represents \$360 billion in annual domestic sales and sustains more than four million American jobs.

Thank you for this opportunity to submit comments. The U.S. apparel and footwear industry is on the frontlines of globalization. As such, we are also in many cases the first industry to be subject to new restrictions around the world. AAFA members produce, market, and sell apparel and footwear in virtually every country around the world, including Argentina which currently stands as the worst offender of such trade restrictions.

Over the past few years we have seen increased protectionist measures on the part of Argentina’s government transcend from onerous challenges for importers to trade policies that, not only make the Argentine market nearly impossible for importers to penetrate, but harm those who are manufacturing within Argentina as well. AAFA fully supports the U.S. effort to draw attention to and find resolution for Argentina’s trade-restrictive policies under the auspices of the World Trade Organization (WTO).

1601 North Kent Street
Suite 1200
Arlington, VA 22209

(703) 524-1864
(800) 520-2262
(703) 522-6741 fax
www.wewear.org

Please consider the list below of the most egregious examples of these policies which range from import quotas and non-automatic import licenses to minimum pricing and intentionally slow and thorough processing of imports. We feel these actions are not compliant with WTO regulations and should be considered as the dispute settlement process moves forward.

- 1) Under resolution MEOSP 17/99, Argentina requires importers to obtain an import license (*Licencia Automática de Importación* or LAPI) for many products, including textiles, apparel, and footwear, to go through customs clearance. A separate license is required for each customs classification code of goods. While an import license requirement is not uncommon, Argentina employs a system of non-automatic import licenses (NAILs) which lengthens the time it takes for imported goods to clear Argentine customs procedures. Rather than have a standardized path for clearance, each individual shipment must be examined by authorities – a process which often takes an extraordinary amount of time. While this system has affected footwear and apparel products imported into Argentina for several years, at the beginning of this year, the Argentina government expanded the list to almost 4,000 products in 600 Harmonized Tariff Schedule lines, affecting a broad range of U.S. exports including textiles, footwear, apparel, toys, auto parts, and electronics. These NAILs come on top of extensive quotas in place for products like footwear which are already hurting U.S. companies.

Furthermore, there are two separate federal entities which regulate imports in Argentina – the Directorate General of Customs, or *La Dirección General de Aduanas* (DGA) and the Ministry of Industry – and both must approve requests for import licenses. There is often a lack of communication between the two agencies and companies are forced to submit documents multiple times and frequently receive conflicting answers on requirements from the two agencies. Any costs caused by the delay of shipment incorrectly submitted documentation are attributed to the importers.

NAILs systems like that in Argentina are permitted under the WTO Agreement only if the licenses are processed within 60 days and are not trade distorting. However, this is not the case in Argentina. Many U.S. companies have had shipments delayed by this system for months, preventing the companies from fulfilling sales and orders to retailers in Argentina, and leading to other related problems. For example: A certificate of origin is required to accompany all imported goods. While this is not uncommon for importation in many countries, including the United States, and obtaining a certificate of origin is not usually a difficult process – the certificate need only be certified by an Argentine consulate – such a certificate in Argentina is valid for only 180 days and the extreme delays on products which are subject to NAILs often last longer than the period of time in which the certificate is valid.

We understand this issue rose to the top when the United States requested consultations with Argentina. The following issues are just as relevant to U.S. companies and we hope they will be addressed as well as the dispute settlement proceedings go forward.

- 2) Many of the challenges related to importing into Argentina, including the import license system mentioned above, stem from an overly burdensome and out-of-date “import-balancing” policy in Argentina which requires companies to export the same dollar amount as they import. The intent behind this policy is to encourage manufacturing within Argentina; however, it is currently doing the exact opposite. Argentine companies, and several U.S. companies who have begun manufacturing in Argentina, are unable to import the raw materials and machinery they need to sustain production because of this policy. They need to import these items before they can begin exporting.

Ironically, this “import balance” policy went into effect after Argentina defaulted on its loan obligations to the Paris Club as well as several other creditors including ones in the United States and were denied access to international credit markets. This just goes to show that one bad decision often leads to another and two wrongs undoubtedly do not make a right. This kind of behavior is certainly not representative of the WTO, let alone a member of the G-20.

- 3) On January 10, 2012, Argentina’s Federal Administration of Public Revenue, or *La Administración Federal de Ingresos Públicos* (AFIP) published AFIP General Resolution 3252, which requires importers to file a *Declaración Jurada Anticipada de Importación* (DJAI) – a sworn advance customs and excise statement – and receive prior approval by not only AFIP but also the office of Domestic Trade in Argentina before importers can proceed with business. This process must be undertaken for each individual shipment and takes a considerable amount time and money to coordinate between the two separate government entities. If cargo arrives without a DJAI document, the goods will be refused by Customs.
- 4) Argentina applies reference prices for more than 50 categories of products, including textiles, apparel, and footwear which establish a minimum price for market entry. Importers must pay duties calculated on the reference price of goods, rather than the actual price, forcing higher tariff rates onto U.S. companies.
- 5) The points of entry specific products may use to enter Argentina are restricted for several classes of sensitive goods including textiles, apparel, and footwear through specialized customs procedures for these goods. Many U.S. and other businesses import multiple types of goods (for example: footwear and handbags) but are unable to efficiently ship the products together as they must enter through separate ports.
- 6) Finally, and probably most frustrating, Argentina’s import requirements are known to change within a short period of time without prior warning. These requirements are not codified in law or regulation and are often reported to companies informally by the Argentine government through telephone calls or other undocumented forms of communication.

Beyond the overt import restrictions listed above, importers of textiles, apparel, and footwear – AAFA’s membership – must comply with specific other requirements when accessing the Argentina market, including shipment documentation, labeling requirements, product safety requirements, restricted substances, and trademark registration. These requirements in Argentina are far beyond what is required in most other countries and serve as additional barriers to trade. AAFA has recently undertaken a project to provide our members with insight into how to access the markets of highly sought-after or, in Argentina’s case, difficult to penetrate countries. We have created “country profiles” which address the key features that are unique to a country but necessary for foreign businesses to understand when looking to sell textiles, apparel, or footwear within that country’s borders. AAFA’s country profile for Argentina is attached as an addendum to these comments, to give an example of how challenging it is to access the Argentina market. The profiles also provide a rating scale of one to five, with five being the greatest, which represents ease of doing business within the chosen country. Please note Argentina has received a rating of zero for both apparel and footwear – a first in AAFA history.

It is also important to note that the political and economic environment in Argentina today is almost as worrisome as the policies themselves. In many cases, when U.S. companies have approached the Government of Argentina to express concerns, they face even tougher restrictions on their business in the country. Those smaller companies which cannot afford the risk are forced to swallow unfair practices in fear of even rougher retaliatory actions.

AAFA applauds the United States for taking steps to resolve the policies that serve as barriers to trade. Argentina's current policies seem to violate the regulations set out by not only the WTO, as noted above, but by the U.S. – Argentina Bilateral Investment Treaty as well by preventing U.S. companies to invest in Argentina. Furthermore, Argentina's actions set a dangerous precedent for other countries in the region and around the world.

Today's supply chains are based on the reliable and efficient movement of goods from all over the world. Argentina's trade-restrictive policies serve as serious impediments to that movement and the global supply chain in general. The policies are perilous for U.S. manufacturers and manufacturers of U.S.-branded products looking to access the Argentine market, for manufacturers in Argentina, and to the consumers all over the world who will ultimately be forced to pay the additional costs which result from delays in shipments, including increased transaction costs and inventory investments.

One of the most prominent challenges faced by the U.S. Government over the past three years has been creating and sustaining American jobs. To this accord, we would like to underline a point mentioned at the beginning of these comments: the U.S. apparel and footwear industry directly employs more than four million U.S. workers. These important jobs include industry executives, textile mill workers, logistics specialists, compliance managers, sourcing managers, wholesalers, retail floor associates, technical designers, and marketing professionals, just to name a few. The industry also supports countless other U.S. industries, like the more than 37,000 transportation jobs it requires to move products from the port to the sales floor and the 235,000 dry cleaning jobs required to maintain and protect the industry's quality product. The U.S. apparel and footwear industry represents more than three percent of the entire U.S. workforce. Without a significant effort to reduce trade barriers in Argentina and around the world, these American jobs will be threatened.

Through difficult economic times, AAFA's members have struggled to keep their doors open and remain productive members of the American economy as producers, consumers, and employers. The main sustaining factor in this struggle has been trade. For this reason, AAFA will continue to work on overcoming barriers to trade and promoting the growth of American companies. I hope that we may be able to continue to work with the U.S. Government and specifically the office of the U.S. Trade Representative on these shared goals.

Thank you for your time and consideration in this matter. Please do not hesitate to contact AAFA if we can be of any help to you. Please feel free to contact me or Marie D'Avignon of my staff at 703-797-9038 or by e-mail at mdavignon@wewear.org if you have any questions or would like additional information.

Sincerely,

A handwritten signature in black ink that reads "Kevin M. Burke". The signature is written in a cursive, flowing style.

Kevin M. Burke
President & CEO

COUNTRY PROFILE: ARGENTINA

EASE OF DOING BUSINESS

On a scale of one to five, with five representing the greatest ease of doing business, AAFA gives Argentina a rating of:

APPAREL



FOOTWEAR



AAFA STAFF CONTACT

Marie D'Avignon
(703) 797-9038
mdavignon@wewear.org

Interested in market access issues? Join AAFA's Market Access Team today by contacting Marie or visit wewear.org.

MARKET ACCESS

Argentina has been a member of the World Trade Organization (WTO) since 1995.

Argentina is a member of the southern cone common market, MERCOSUR. All MERCOSUR member countries, Argentina, Brazil, Paraguay, Uruguay, and Venezuela, share common market requirements such as labeling and standards, and products within MERCOSUR are duty-free. For more information on MERCOSUR, please visit <http://www.mercosur.int/>.

MERCOSUR has free trade agreements with Israel, Bolivia, Chile, Egypt, and the Palestinian Authority, as well as several framework agreements with other countries. In addition, Argentina has partial preferential trade agreements with

Brazil, Uruguay, Mexico, Paraguay, and Chile.

For more information on Argentina's trade agreements, please visit http://www.sice.oas.org/ctyindex/ARG/ARGagreements_e.asp.

Tariffs & Fees

MERCOSUR countries also comprise a customs union and all apply a common external tariff (CET) on most products imported from non-MERCOSUR countries. Argentina, however, has CET exceptions in many categories including apparel, textiles, and footwear. Argentina uses reference pricing to calculate duties and taxes for textiles, apparel, and footwear. Tariff duties are assessed on the cost, insurance, and freight (CIF) value of a product on an ad valorem basis.

Average Rate of Duty for imported goods into Argentina:

- Textiles = 4-35% of CIF (Only chapters 57 and 63 reach 35%, the majority of textile chapters do not pass 26%)
- Apparel = 35% of CIF
- Footwear = 18-35% of CIF

Detailed tariff rates for Argentina and other WTO countries are available online at <http://tariffdata.wto.org/ReportersAndProducts.aspx>.

Certain products imported into Argentina (from non-MERCOSUR countries), including textiles and footwear, are charged compound rates consisting of ad valorem duties plus specific levies known as "minimum specific import duties" (DIEMs). However, even if a product is subject to DIEM duties plus ad valorem duties, the total combined duties are not supposed to exceed the maximum MERCOSUR-bound rate of 35 percent. Although the DIEMs were set to expire on December 31, 2010, and the government of Argentina has not formally extended them, the United States Trade Representative reports they are still being charged http://www.ustr.gov/sites/default/files/Argentina_o.pdf.



FAST FACTS

DEMOGRAPHICS

Population: 42.2 million
Language: Spanish
2011 Nominal GDP: \$725.6 billion
2011 GDP per Capita: \$17,700

2011 EXPORTS

Overall: \$76.53 billion
Apparel: \$76.46 million
Textile: \$819.38 million
Footwear: \$33.78 million

2011 IMPORTS

Overall: \$66.47 billion
Apparel: \$584.04 million
Textile: \$1.52 billion
Footwear: \$447.78 million

Sources: CIA World Fact Book, International Trade Centre
Note: Figures in USD

ADDITIONAL RESOURCES

International Trade Administration, Office of Textiles and Apparel (OTEXA)
<http://web.ita.doc.gov/tacq/overseasnew.nsf/alldata/Argentina#Labeling>

Export.gov Doing Business in Argentina
<http://export.gov/argentina/doingbusinessinargentina/argentinacountrycommercialguide/traderegulationsandstandards/index.asp>

Argentina Ministerio de Economía
<http://www.mecon.gov.ar/>

Argentina Ministerio de Industria
<http://www.indcompyme.gov.ar/>

U.S. Trade Representative Argentina Trade Summary
http://www.ustr.gov/sites/default/files/Argentina_o.pdf

In addition to tariffs, there are several supplementary taxes or charges that apply to imports of both apparel and footwear:

- Statistics Fee = 0.5% of CIF (not applicable to MERCOSUR countries)
- Value Added Tax (VAT) = 21% of CIF + tariff + statistics fee
- Anticipated Profits Tax = 3% of CIF.

All duties and taxes should be paid to the Federal Administration of Public Revenue, or La Administración Federal de Ingresos Públicos (AFIP) at <http://www.afip.gov.ar/home/index.html>.

More information on MERCOSUR Customs Union can be found at http://www.mercosur.int/t_ligaenmarco.jsp?contentid=289&site=1&channel=secretaria.

Argentina also applies reference prices for many products which establish a minimum price on which duties are calculated. For more information see import restrictions.

Import Procedures

The Directorate General of Customs, or La Dirección General de Aduanas (DGA), is a part of the AFIP, and is responsible for implementing and enforcing legislation on the import and export of goods into Argentina. For more information on Argentina Customs, please visit <http://www.afip.gob.ar/aduanaDefault.asp>.

Due to the complicated import procedures and restrictions in Argentina, it is recommended that companies employ a local customs broker. A list of customs brokers is available online at http://www.aduanaargentina.com/listado_en.php?seccion=4.

Importers must register with Argentina's exporter and importer registry (Registro de Exportadores e Importadores) through the DGA. The one-time procedure and is valid for export and import operations. Registration can be done by the importer (individual or legal entity) or by a customs broker. Applicants must meet the following requirements in order to register:

- Prove domicile (or corporate headquarters in the case of companies), and constitute domicile in Argentina;
- Be registered with the Argentine Public Registry of Commerce (PRC) either as a trader or company;
- Provide a Tax Registration Number (Clave Única de Identificación Tributaria or CUIT) as proof of the

trader or company's registration with the AFIP;

- Supply evidence of solvency and provide the DGA with a guarantee for the faithful compliance of obligations if deemed necessary.

For more information, please visit <http://www.embassyofargentina.us/v2011/en/economyandtrade/investments/files/investorsguide.pdf>.

The following documents are required to accompany any cargo shipments imported into Argentina:

- Commercial invoice (in Spanish, original document plus three copies) including the following information:
 - Invoice number
 - Origin of goods and date of shipment
 - Name and contact information of exporter
 - Name and contact information of exporter of consignee
 - Full description of goods
 - Total price of goods and price per unit
 - Currency used
 - Terms of payment and delivery
 - Mode of transportation
 - Place of entry into Argentina
 - Bill of lading (for maritime shipments) or Airway bill (for air shipments)
- Packing list
- Insurance certificate (if applicable)
- Certificate of origin (required for textiles and footwear under Resolution MEOSP 39/96)

In addition, all commercial invoices must bear the following signed declaration:

"Declaro bajo juramento que los precios consignados en esta facture comercial son los realmente pagados o a pagarse, y que no existe convenio alguno que permita su alteración, y que todos los datos referentes a la calidad, cantidad, valor, precios, etc., y descripción de la mercadería concuerdan en todas sus partes con lo declarado en la correspondiente shipper's export declaration."

("I swear under oath that the prices on this commercial invoice are those really paid or to be paid, and that no agreement exists that permits their modification, and that all data pertaining to quality, quantity, value, prices, etc., and description of the merchandise agree in all their parts with what was declared in the corresponding Shipper's Export Declaration.")

All documents must be in Spanish or carry an accurate Spanish translation.

All documents must be presented for customs clearance within 15 days of shipment.

Import Licenses

Under resolution MEOSP 17/99, Argentina requires importers to obtain an import license (Licencia Automática de Importación or LAPI) for many products, including textiles, apparel, and footwear, to go through customs clearance (import licenses are not required if the total value of the imports is less than FOB \$800).

A separate license is required for each customs classification code of goods.

Textiles, apparel, and footwear are now subject to non-automatic import licensing which requires approval from the government of Argentina before a shipment is approved. See import restrictions.

As of February 1 2012, Importers must declare the value of shipments they wish to import into Argentina prior to shipping. This is done through the Anticipated Imports Sworn Statement or Declaración Jurada Anticipada de Importación (DJAI). If cargo arrives without a DJAI license, the goods will be refused by Customs. For more information, please visit <http://www.afip.gob.ar/genericos/novedades/declarJuradaAnticipada.asp> or https://www.wewear.org/assets/1/7/argentina-import-restrictions_feb_2012.pdf.

Import Restrictions

Argentina's system of Non-Automatic Import Licenses (NAILs) previously affected only footwear apparel products, but has now been expanded to almost 600 product categories of Argentinian imports. The NAILs often cause delays anywhere from days to months and the importers are responsible for any costs associated with delays. The full list of product affected is available online at http://export.gov/argentina/build/groups/public/@eg_ar/documents/webcontent/eg_ar_043618.pdf.

Argentina has imposed an import export balance (i.e. companies are required to export the same dollar value as they import), which has led to problems for companies attempting to import raw materials or equipment before they are able to export finished product.

There are two separate federal entities which regulate imports – the DGA and the Ministry of Industry – and both must approve requests for import licenses. However, there is often a lack of communication between the two agencies and companies are often forced to submit documents multiple times and receive conflicting answers on requirements.

Argentina's import requirements are known to change within a short period of time without prior warning. These requirements are not codified in law or regulation and are often reported to companies informally by the Argentine government through telephone calls or other undocumented forms of communication.

Argentina applies reference prices for more than 50 categories of products, including textiles, apparel, and footwear which establish a minimum price for market entry. Importers must pay duties calculated on the reference price of goods, rather than the actual price. A full list of reference prices is available online at <http://www.afip.gov.ar/aduana/valoracion/valores.criterios.pdf>.

The points of entry specific products may use to enter Argentina are restricted for several classes of sensitive goods including textiles, apparel, and footwear through specialized customs procedures for these goods. A full list of products affected and the ports of entry applicable to those products is available online at <http://www.infoleg.gov.ar/infolegInternet/anexos/130000-134999/131847/norma.htm>.

As stated under the Import Procedures section, a certification of origin is required to accompany all imports. Obtaining a certificate of origin for imported goods is not usually a difficult process. The certificate need only be certified by an Argentine consulate. However, the certificate is valid for only 180 days and extreme delays on products which are subject to NALs often last longer than the period of time in which the certificate is valid.

In 2008 and 2009, Argentina established two administrative mechanisms (through Customs External Notes 87/2008 and 15/2009) which restrict the entry of sensitive products which come from "high risk" nations. High risk nations are those deemed by the Argentina government likely to commit valuation or trademark fraud. Text of the Customs External Note is available online at <http://>

www.infoleg.gov.ar/infolegInternet/anexos/145000-149999/145766/norma.htm. The Note does not describe how these mechanisms are put into effect, but it likely coincides with the reference pricing system mentioned above.

Argentina's import restrictions have been accused of violating WTO regulations. In the Spring and Summer of 2012, the United States, the European Union, Japan, and Mexico have each separately initiated cases against Argentina within the WTO.

LABELING

All products imported into Argentina must be labeled in accordance with Law 22802/83 of Lealtad Comercial which establishes basic minimal mandatory requirements:

- Name of the product
- Quality
- Country of origin
- Net content

Information on labels must be in metric system units.

Apparel and Textiles

Argentina has adopted the common MERCOSUR requirements for textile labeling as established in *MERCOSUR Resolución No. 9/2000 que establece el Reglamento tecnico de Mercosur de etiquetado de productos textiles* (<http://www.planetaius.com.ar/foroderecho/mercotur-gmc-res-n-9-2000-a-38765>), which was implemented in June, 2001 (*Resolución 287/2000 de la Secretaria de Industria incorporando en el ordenamientojuridico nacional la Resolucion Mercosur 9*). These requirements apply to products consisting exclusively of textile fibers or textile filaments, or both, in a raw, processed or semi-processed, manufactured or semi-manufactured, prepared or semi-prepared state.

Textile and apparel products composed of at least 80% fibers that are imported for consumption or produced in Argentina (and all MERCOSUR countries) will require the following information on a permanent label that is affixed to the product:

- Name or registered brand and tax identification and address of the domestic producer or importer
- Country of origin
- Fiber content
- Care instructions in words or symbols

- Size or dimensions, as applicable

This information must be written in Spanish for Argentina, but may also be in other languages.

The writing on the products' labels should be clear, permanent and indelible. The size of the letters cannot be smaller than 2mm. The information can be written on either one side or both sides of the label.

Footwear

Footwear sold in Argentina must be permanently labeled with the following information:

- Care instructions in words or symbols
- Upper composition*
- Outsole composition*
- Lining composition*
- Sock-liner composition*
- Country of origin
- Importer CUIT (tax ID number, see import procedures)

*If the upper, outsole, lining, or sock-liner contains more than one material, you must list the percentages for each material, i.e. an outsole that is 100% rubber can just say "outsole rubber," but an upper consisting of multiple textile materials should say "60% nylon 40% polyester."

The care instructions may be on a separate label, but all composition and importer information must be on one label.

The only acceptable care symbols for Argentina are those created by GINETEX and are copyright protected. For more information on the use of care symbols, visit the GINETEX website at <http://www.ginetex.net/labelling/care-labelling/care-symbols/>.

PRODUCT SAFETY & RESTRICTED SUBSTANCES

Argentina participates in the development of MERCOSUR standards and regulations. The MERCOSUR Standards Association, AMN (previously known as the Comité MERCOSUR de Normalización) -- composed of the standards institutes of Argentina, Brazil, Paraguay, and Uruguay -- develops and harmonizes standards.

Argentina's Product Safety landscape is made up of voluntary standards which are created by several standard setting bodies such as Instituto Argentino de Normalización – IRAM (<http://www>.

iram.org.ar/), Organismo Argentino de Acreditación – OAA (<http://www.oaa.org.ar/>), and the Instituto Nacional de Tecnología Industrial - INIT(<http://www.inti.gov.ar/>). As a member of MERCOSUR, Argentina also participates in the development and harmonization of standards with other MERCOSUR countries through the Asociación MERCOSUR de Normalización – AMN (<http://www.oaa.org.ar/>).

Argentina has mandatory requirements for protective clothing under Resolution 896/99 (<http://www.taccanos.com.ar/images/res896.pdf>) which requires compliance with standards developed by IRAM, MERCOSUR, EU, or ISO. The manufacturer must also obtain certification of compliance and an "S-mark" from an entity recognized by the DNCI (Dirección Nacional de Comercio Interior, national domestic trade office).

Due to the rapidly changing nature of chemical management regulations, please refer to AAFA's Restricted Substance List (RSL) which contains the most up-to-date and comprehensive list of chemical restrictions worldwide. AAFA's RSL is available online at <https://www.wewear.org/industry-resources/restricted-substances-list/>.

For information on global drawstring regulations, please see AAFA's International Drawstring Regulations List available online at <https://www.wewear.org/drawstrings>.

TRADEMARK REGISTRATION

The National Institute of Industrial Property (INPI) is the entity charged with registering trademarks in Argentina. The registration of a trademark gives its holder exclusive use for 10 years. Applicants are required to complete an Application for Trademark Registration. INPI will then review the application to ensure compliance with the law. Registration forms are available online at http://www.inpi.gov.ar/pdf/Marcas_Registro.pdf.

Applications are published in the Trademark Gazette usually 46-60 days after application has been filed. Without any opposition, an application can take between one year and eighteen months from application to registration.

An applicant may also renew the trademark indefinitely using this form at http://www.inpi.gov.ar/pdf/Marcas_Renovacion.pdf.

Fees

Registration - \$86

Renewal - \$104

For more information, please visit <http://www.inpi.gov.ar/templates/marcas.asp>.

DISCLAIMER

This document is provided by the American Apparel & Footwear Association (AAFA) for informational purposes only. No part of this document constitutes legal advice. This document is intended for only use by members of AAFA and other specifically designated parties. Access to this document by anyone other than the intended recipient is strictly prohibited. For full disclosure, please visit <https://www.wewear.org/globalgrowth>.