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METHODOLOGICAL REPORT REGARDING THE
NEED TO SUBMIT A “TERMO DE
RESPONSABILIDADE” (PRE-APPROVAL) TO THE
CENTRAL IMMIGRATION SERVICES WHEN
REQUESTING A VISA FOR THE PURPOSE OF
VISITING CLIENTS

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CONFIDENTIALITY AND LIMITATIONS

This methodological report is limited to matters of Mozambican Law relating to the need to submit a “termo de responsabilidade” to the Central Immigration Services when requesting a visa for visitors, and is based on national legislation, as well as on an understanding and interpretation of the laws in force on the date of its drafting.

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This opinion speaks only as of the date hereof, and we do not accept any responsibility for the updating or supplementing of it, after that date.

INTRODUCTION

This technical report has arisen from a request made, by DAI SPEED, to SAL e Caldeira Advogados, Lda., (S&C) for consultancy services involving the clarification of aspects relating to the need to submit a “*termo de responsabilidade*” when requesting a visa for visitors travelling to Mozambique, in accordance with relevant legislation.

This specialized consultancy aims to analyze the legal system in general, so as to identify problems arising from the need for a “*termo de responsabilidade*”, as a requirement for a visitor’s visa application, and includes the drafting of proposals for the facilitation of the obtaining of such “*termo de responsabilidade*”, in order to obtain visas.

It is important to state here that the need for a “*termo de responsabilidade*”, as a requirement for the issuing of various types of visas, should, for the purpose of this report, be understood in the context of the Immigration Services’ visa pre-approval process.

The Provincial Immigration Services call this pre-approval process a “request for a *termo de responsabilidade*”, because of the stamp which appears on the approval letter issued by these entities, which contains the expression “*termo de responsabilidade*”.¹

Therefore, the object of this report is not the “*termo de responsabilidade*” (Letter of Acceptance of Responsibility) which we are used to – i.e., a document needed for the purpose of issuing a visa, and which consists of the drafting of a letter by an entity registered in Mozambique, inviting a foreign citizen to Mozambique, and accepting responsibility for his/her accommodation, meals and repatriation, when necessary.

We emphasize that for the purpose of this report, the object of analysis is the “*termo de responsabilidade*” issued by the Immigration Authorities as pre-approval for the issuing of a visa by the embassy or consulate at which the applicant intends to submit the request.

For the purpose of drafting this technical report, we have consulted the following national legislation:

- a) The Constitution of the Republic of Mozambique, approved in December 2004 by the Assembly of Republic;
- b) Law 4/2014, of 5 of February, which created the National Immigration Service (*Serviço Nacional de Migração – SENAMI*);
- c) Law 23/2007, of 1 August, which approved the Labor Law (“LL”);
- d) Law 5/93, of 28 December, which approved the legal regime relating to foreign citizens, and which set out the norms relating to their entry into, stay in and exit from Mozambique, and their rights, duties and guarantees (Law 5/93);

¹ Please note that in Maputo, the approval consists of a stamp containing the word “*visto*”.

- e) Decree 63/2011, of 7 December, which approved the Regulations on the Hiring of Foreign Citizens for the Petroleum and Mining Sector (Decree 63/2011)
- f) Decree 55/2008, of 30 December, which approved the Regulations Relating to the Mechanisms and Procedures for the Hiring of Foreign Citizens (Decree 55/2008);
- g) Decree 38/2006 of 27 September, which approved the Regulations on Law 5/93, (D38/06);
- h) Decree 30/2001, of 15 October, which approved the operating rules for the Public Administration Services and revoked Decree 36/89, of 27 December (D30/01);
- i) Decree 38/2000 of 17 of October, regarding the creation of the border visa (D38/00);
- j) Decree 18/96, of 11 June, which authorised the Ministers of Planning and Finance, and of Home Affairs, to update the amounts of the fees owed for acts by, or services rendered by, the Immigration Services;
- k) Presidential Decree 12/95, of 29 December, which defined the objectives, attributes and competencies of the Ministry of Foreign Affairs and Cooperation;
- l) Ministerial Diploma 262/2010 of 14 of December, which amended the table of fees for the granting, renewal and substitution of passports, visas and biometrically and electronically read residence permits (DIRE's), approved by Ministerial Diploma 140/2010, of 27 August;
- m) Ministerial Diploma 68/2001, of 2 May, which published the Charter of the Ministry of Home Affairs and revoked Ministerial Diploma 86/93, of 22 September;
- n) Ministerial Diploma 18/2007 of 9 February, which updated, by a factor of 2.06, the specific fees charged by the Immigration Services, contained in the tables which constituted Annexures I to V of Ministerial Diploma 85/94 of June (with the correction published in the *Boletim da República*, 1st Series, number 13, on 2 April 2007).

The following circulars and notices were also consulted:

- a) Circular 01/DALF.F-DNM/2012, issued by the National Directorate of Immigration on 10 February 2012, regarding payments for services by means of bank certified cheques;
- b) Circular 1, of 23 March 2013, issued by the National Directorate of Immigration, regarding the new cost of immigration forms;
- c) Order issued by the National Directorate of Immigration on 27 November 2013, regarding the collection in person of documents requested from Immigration.

In the context of a comparative law study, the following foreign legislation was consulted:

- a) Law 5/2008, of 12 August – Law regarding the Legal Regime for Foreign Citizens in São Tomé and Príncipe;
- b) Law 2/07 of 31 August – the Legal Regime for Foreign Citizens in the Republic of Angola;
- c) Immigration Law (Malawi) 1968, with amendments made in 1988;
- d) Decree-Law 244/98, of 8 August, which regulates the conditions for the entry, stay, exit and expulsion of foreigners from the national territory (Portugal);
- e) Decree-Law 4/2001 – Amended Decree-Law 244/98, of 8 August (Portugal).

Lastly, formal and informal consultations were held with the following institutions' employees:

- a) Immigration Services for the Province of Cabo Delgado;
- b) Immigration Services for the Province of Inhambane;
- c) Immigration Services for the Province of Maputo;
- d) Immigration Services for the Province of Nampula;
- e) Immigration Services for the Province of Sofala;
- f) Immigration Services for the Province of Tete;
- g) Consular Services of the Angolan Embassy in Mozambique;
- h) consulate of Portugal in Mozambique; ;
- i) Consular Services of the Malawian Embassy in Mozambique
- j) South African High Commission in Mozambique;
- k) Mozambican Embassy in the Federal Republic of Germany;
- l) Mozambican Embassy in the Kingdom of Belgium;
- m) Mozambican High Commission in the Republic of Botswana;
- n) Mozambican consulate in Cape Town (RSA);
- o) Mozambican Embassy in the Republic of Ethiopia;
- p) Mozambican Embassy in the Republic of France;
- q) Mozambican Embassy in the Republic of Italy;
- r) Mozambican High Commission in the Republic of India;
- s) Mozambican High Commission in Pretoria (RSA);
- t) Mozambican High Commission in the United Kingdom;
- u) Mozambican Embassy in the Swiss Confederation;
- v) Mozambican High Commission in the Republic of Zambia;
- w) Mozambican High Commission in the Republic of Zimbabwe.

This technical report is divided into 9 (nine) chapters, namely:

Chapter 1: Background

Chapter 2: The entry, stay and exit of foreigners in Mozambique

Chapter 3: The legality of a "*termo de responsabilidade*" being a requirement for a visa application

Chapter 4: Analysis of the practices in the various provinces, in relation to obtaining a "*termo de responsabilidade*" (pre-approval)

Chapter 5: Information collected from certain Mozambican embassies and consulates regarding the obtaining of pre-approval

Chapter 6: Comparative Law Study

Chapter 7: Problems Identified and Recommendations

Chapter 8: Proposal regarding a new system

Chapter 9: Conclusions and final recommendations

1 BACKGROUND

Since the approval of D38/06, which approved the Regulations on L5/93, containing the norms relating to the entry into, stay in and exit of foreign citizens from Mozambique, and their rights, duties and guarantees, requests for visas have, in general, been submitted directly to the consulates or Consular Services of Mozambique abroad, and these entities have issued visas autonomously.

However, the Mozambican High Commission in India (New Delhi) was one of the first to require that requests for visas for Mozambique be pre-approved by the Immigration Services, and in some circumstances, that the pre-approval request be submitted directly to these services, by someone acting on behalf of the applicant or as its representative.

When processing pre-approval requests, and after receiving a pre-approval request from the Mozambican High Commission in India, or from a person acting on behalf of the applicant, or from his/her representative, the Immigration Services sends the file and the respective approval directly to the Mozambican Embassy in India, for the issuing of a visa.

In 2010, there were some cases in which pre-approval applications which were submitted directly by an applicant's representative to the Immigration Services took almost 2 months to be granted.

In January 2014, a request was made by the Mozambican Embassy in Jakarta, Indonesia, for the pre-approval of a visa application by the Immigration Services in Maputo, but the Immigration Services stated, in reply, that they no longer issued such pre-approvals.

In mid-2014, many Mozambican embassies and consulates abroad started to require pre-approval for the issuing of a visa. Such pre-approval implies delays in the issuing of the visa, which seriously compromise the commercial commitments of various foreign citizens who have had, and still have, commitments in Mozambique.

There is no certainty regarding the reason for the implementation of this practice. However, it is thought to be associated with the Immigration Services' role in controlling immigration, in light of an increase in the flow of foreign citizens into Mozambique. It is possible that this phenomenon has caused the authorities to seek mechanisms aimed at avoiding the illegal stay of foreigners in Mozambique, by controlling visa requests by means of pre-approvals.

However, the legality of this measure needs to be assessed. This report seeks, in the first instance, to evaluate the legality of this practice, by analyzing legal provisions relating to immigration in Mozambique, and in the second instance, to study comparative law, in order to propose possible ways in which to facilitate compliance by foreign citizens with the obligations, responsibilities and commercial commitments which they have in the Mozambican territory.

2 FOREIGNERS' ENTRY INTO, STAY IN AND EXIT FROM MOZAMBIQUE

In order to understand the pre-approving of visas, it is necessary first to analyze, in a general manner, the legal norms relating to the entry, stay and exit of foreigners in Mozambique, and in particular, to analyze the rules relating to the granting of visas, as established by Law.

L5/93 establishes the legal regime for foreign citizens, and sets out the respective rules on their entry, stay and exit from the country, and their rights, obligations and guarantees. D38/06 of 27 September approved the Regulations on this Law.

The documents which permit a foreigner to stay or live legally in Mozambique are the following:

- i) Visas; and
- ii) Residence Permits (DIRE's).

Due to the scope of this report, we will focus solely on the question of the visas, since it is only for the purpose of the issuing of visas that pre-approval is required.

2.1 Types of Visas

Visas may be single-entry or multiple-entry. Single-entry visas are those which permit only one entry, and multiple-entry visas are those which permit various entries, although the duration of the stay may not exceed the period authorized. Multiple-entry visas imply “migratory movement”² by a foreign citizen, when he/she intends to remain in the country during the period for which the visa is valid. In the case of multiple-entry visas, it is necessary to take into consideration the fact that the period of validity of the visa, the period of utility of the visa and the period of authorization of stay, are different aspects.

Visas may be of different types, in accordance with their purpose:

- a) **Diplomatic Visa** –granted to foreign individuals who move to the country in order to conduct diplomatic activities.³
- b) **Courtesy Visa** –granted to foreign individuals who move to the country by invitation of the Mozambican authorities.⁴
- c) **Official Visa** –granted to foreign individuals who travel to the country for official visits.⁵

The type of visas indicated in the table below are the most common:

² “Migratory Movement” is the act of formalizing passage through a border post, officially conducted when a border inspector places a stamp, proving entry into or exit from the country, in a passport or equivalent valid document, in accordance with subparagraph q) of article 1 of D38/06.

³ D38/06, Article 1 Subparagraph j).

⁴ *Ibid.*: Subparagraph x).

⁵ *Ibid.*: Subparagraph e).

Type	Purpose	Validity	Category
Residence/Work Visa	Entitles the holder to enter Mozambique and obtain a residence permit. ⁶	Valid for 30 days, and allow a single entry. ⁷	d)
Tourism Visa	Granted to a foreign citizen who comes to the country for a trip of a recreational or tourist nature.	May not exceed a limit of 90 days. ⁸ May be multiple, granted for a maximum of 6 months, renewable. ⁹	e)
Transit Visa	Granted to a foreign citizen who uses Mozambique as a place of transit, in order to reach his/her final destination. ¹⁰	Granted for a period not exceeding 7 days. ¹¹	f)
Visitor's Visa	Allows its holder to enter the national territory, for purposes which, while accepted by the competent authorities, do not justify the granting of another type of a visa. ¹²	Has a minimum validity of 15 days, renewable for up to a maximum limit of 90 days. ¹³ May be multiple, granted for a maximum of 6 months, renewable. ¹⁴	g)

⁶ L5/93, Article 10 and D38/06, Article 1, subparagraph *hh*).

⁷ These visas should only be requested by foreigners intending to obtain a DIRE. Residence visas may be renewed for up to 60 days. By analogy, we conclude that work visas may also be renewed for an equal period, in accordance with Article 10(2) of L5/93.

⁸ L5/93, Article 11(2). There have been exceptional cases of tourist visas being issued for a longer period. In some circumstances these visas may be renewed at the Immigration Services, and when they have been renewed, may be renewed again, for a further month.

⁹ D38/06, Article 5(5).

¹⁰ *Ibid.*: subparagraph *ii*).

¹¹ L5/93, Article 12 (3).

¹² *Ibid.*: Article 13(1).

¹³ *Ibid.*: Article 13(2).

¹⁴ D38/06, Article 5 (5).

Type	Purpose	Validity	Category
Business Visa	Granted to a foreign citizen who travels to the country in connection with economic activities. ¹⁵	The period of stay is 30 days, renewable for up to 90 days. May be multiple, granted for a maximum period of 6 months, renewable. ¹⁶	h)
Student Visa	Granted to a foreign citizen who comes to the country with the intent of attending a course at an officially recognized establishment. ¹⁷	Valid for 12 months, renewable. ¹⁸	i)
Border Visa	Granted at a border post, in terms of the Law, to a foreigner coming into the country. ¹⁹	Valid for one entry, for a stay of 30 days, renewable for up to 60 days. ²⁰	Undefined

In practice, visas are issued and renewed by Mozambican consulates abroad, except for border visas, which are issued by the competent authorities at border posts in Mozambique.

It is worth mentioning that the Law establishes that border visas may be granted to foreign citizens from countries where there are no Mozambican embassies or Consular Representations.²¹ However, the Law also states that foreign citizens from countries in which Mozambican embassies or Consular representations do exist, may be granted border visas, on payment of an additional 25% of the total fee.

In terms of current administrative practice, border visas are no longer issued at airports to foreign citizens who have Mozambican embassies or Consular representations in their countries of origin.

¹⁵ *Ibid.*: subparagraph *dd*).

¹⁶ D38/06, Article 5 (5).

¹⁷ *Ibid.*: subparagraph *z*).

¹⁸ Law 5/93, Article 15

¹⁹ *Ibid.*: subparagraph *aa*).

²⁰ D38/00, Article 1.

²¹ D38/00, Article 2.

In relation to foreign citizens from countries in which a Mozambican embassy or Consular representation does not exist, Immigration recommends that they obtain a visa from a neighboring country, or request a border visa by means of a pre-approval request.

We have thus verified that pre-approval, by immigration, has also begun to be required for the granting of border visas. Pre-approval for the issuing of a border visa has been granted to foreigners located in countries in which a Mozambican diplomatic representation does not exist.²²

In relation to visas, the following considerations should be taken into account:

- a) A business visa does not, on its own, grant its holder a right to work in Mozambique. For the purpose of work, a foreign citizen should obtain a work permit within/outside of the quota, or a Short Term Work Permit (STWP).
- b) The Labor Law, at Article 32 (1), prohibits the hiring of a foreign citizen when he/she has entered the country by means of a diplomatic, courtesy, official, tourism, visitor's, business or student visa. Even though this article has caused interpretation problems in various Provincial Directorates, the tendency which currently prevails is the understanding that this provision does not apply to work conducted under a STWP, i.e., a foreign citizen may enter Mozambique on a business visa, and then request a STWP.
- c) Some Mozambican diplomatic representations abroad have been demanding pre-approval for the issuing of a business or visitor's visa, this pre-approval being known as a "*termo de responsabilidade*";
- d) Border visas have begun to be issued in a limited manner, and are also subject to pre-approval.

2.2 Documents required for the submission of a visa application

The requirements for the different types of visas vary from consulate to consulate. It is important to state that the rules and practices of the various Mozambican institutions tend to change without prior notice, and for this reason it is advisable that before any visa application is submitted, an updated list of necessary documents is obtained.

2.2.1 Business Visa

In general, the following documents are required for the issuing of a business visa – in addition to what other consulates may request, because of current practice, or discretionary powers from which they may benefit:

²² In some cases, and in order to grant pre-approval for a border visa, Immigration demands, in addition to there being no embassy or consulate in the country of origin of the citizen, that it be impossible for that citizen to travel to a neighboring country in which there is a Mozambican Diplomatic representation, in order to request a border visa. However, Immigration has shown itself to be flexible in granting pre-approval for a border visa for citizens from countries in which a Mozambican embassy or consulate exists, when the application letter is duly justified and the facts alleged in it are proven. Border visas have not been completely abolished. However, we used to have a system for the issuing of border visas which consisted of a foreign citizen obtaining the visa at his/her arrival at the border post. This system has been changed, via the introduction of a need for a pre-approval for a border visa, as well.

- a) Application letter;
- b) Invitation Letter;
- c) Letter of Acceptance of Responsibility (also called a “*termo de responsabilidade*”);
- d) Forms, duly filled in;
- e) Trading license (*alvará*) or equivalent document;
- f) Notarized copy of passport;
- g) Payment of fees; and
- h) Passport, valid for at least 6 months²³

Note that the letter of acceptance of responsibility referred to in point 2.2.1 c) refers to a letter issued by an entity registered in Mozambique, taking responsibility for the accommodation, stay, meals and repatriation, if necessary, of the foreign citizen who is invited to visit Mozambique for business purposes²⁴. This letter forms part of the set of documents required for a business visa application, which must be submitted at the Mozambican embassy or consulate abroad.²⁵

2.2.2 Work Visa:

In general, the following documents are required for the issuing of a work visa:

- a) Passport, valid for at least 6 months;
- b) Application letter;
- c) Letter of Acceptance of Responsibility;
- d) Forms, duly filled in;
- e) Police Clearance Certificate issued in the country of origin or the last country of residence (in the previous 2 years);
- f) Sworn translation of police clearance certificate;
- g) Notarized copy of Work Permit within/outside of the quota;
- h) Trading license (*alvará*) or equivalent document;
- i) Notarized copy of passport;
- j) Payment of fees.²⁶

As mentioned above, a work visa is normally only requested for holders of a work permit within/outside of the quota and for those who intend to obtain a DIRE (residence permit).

A DIRE application covers the family members of the holder of the work permit within/outside of the quota. For dependents, a residence visa is issued and not a work

²³ D38/06, Article 11.

²⁴ It is understood that the purpose of a business visa, in terms of current practice, also covers foreign citizens entering Mozambique to render casual, unpredictable and occasional work, i.e, Short Term Work. These citizens must, for this purpose, and apart from a business visa, apply for a Short Term Work Permit.

²⁵ For the purpose of this report, the “*termo de responsabilidade*” to which we refer is the pre-approval which has to be sent by the embassy or consulate at which the applicant submitted the request for an entry visa, to the Immigration Services for approval, or submitted by a third party, on behalf of the applicant or in representation of him/her, directly to the Immigration Services. Note that this last procedure is that which is most frequently used.

²⁶ The fee for work visa application varies from consulate to consulate.

visa - however, in practice, a work visa and a residence visa are the same, with respect to their purpose.

2.2.3 Residence Visa

In addition to the requirements listed for obtaining a work visa, the following documents are required for dependents of a holder of a work permit within/outside of the quota.

- a) Marriage Certificate;²⁷ and
- b) Birth Certificate.

²⁷ For unmarried couples this is debatable. Some understand that this document may be replaced with proof of a de facto union, issued in their country of origin.

3 THE LEGALITY OF A “TERMO DE RESPONSABILIDADE” AS A REQUIREMENT FOR A VISA APPLICATION

3.1 The legality of a “termo de responsabilidade” (pre-approval)

Article 6 of D38/06 determines that “the granting of a visa by embassies and consulates requires prior consultation of the Immigration Services”.

However, note that the Law does not clearly set out the mechanisms and procedures for pre-approvals, and it is understood that the consultation referred to in the article above, means internal consultation, conducted between the relevant embassies, consulates and the Immigration Services.

In no instance does the Law determine that for the granting of an entry visa, a request for pre-approval must be submitted to the Immigration Services by someone acting on behalf of the applicant, or by his/her representative - and for this reason, an interpretation in terms of which pre-approval for a visa application, would by law, be required in accordance with current practice, would be somewhat forced.

In fact, Article 18 of D38/06, which sets out the rules for the processing and delivery of visas, reinforces the above understanding, as it does not indicate how pre-approval for a visa is to be processed, establishing only that “the embassies and Consular posts should regularly send the Immigration Services a monthly list of all visas authorized and rejected, in which the following should be stated:

- a) The number of the order;
- b) The name and nationality of the applicant;
- c) The number of the visa;
- d) The type of passport or equivalent document, in which the visa was granted;
- e) The category and the period of validity of the visa which was granted;
- f) The reasons for the rejection of the application.”²⁸

As a result of subparagraph f) above, our interpretation is the following:

- i) From the meaning given to Article 6 of RL5/93, read together with the other articles mentioned above, the prior consultation required by this article cannot be understood as establishing the current procedure for pre-approval requests; and
- j) By stipulating “prior consultation”, the legislator intended to require internal consultation between embassies, consulates and Immigration.

The conclusion indicated above has been drawn as a result of the fact that Article 18 of D38/06 is the only Article which refers to the processing of visa applications by embassies

²⁸ D38/06 Subparagraph f) of paragraph 2.

and consulates, and does not contain a clear indication of the pre-approval practice established in Article 6 of the same diploma.

3.2 Criteria for the appraisal of visa applications

In order to better analyze the legality of the pre-approving of visas, it is important to analyze the criteria for the appraisal of visas, and conditions for obtaining an entry visa.

We thus now reproduce the wording of Article 9 of L5/93, regarding criteria for the appraisal of a visa application:

“For the appraisal of visa applications, the following factors shall, amongst others, be considered:

- a) The intended purpose of the stay of the applicant and its viability;
- b) Means of sustenance of the applicant in Mozambique;
- c) Financial resources available for his/her return and travel.”²⁹

It is our understanding that the use of the words “amongst others” at the beginning of the provision was intended to highlight the fact that the criteria referred to in subparagraphs a), b) and c) are not the only ones to be taken into consideration when considering a visa application, and that others may be considered.

As such, pre-approval might have been demanded for the granting of a visa, in order to evaluate “other factors” when considering a visa application.

These factors may be associated with the increasing flow of foreign citizens into the country, seeking work, and more precisely, with the control of illegal immigration.

We also quote Article 16 (1) of the same diploma, which establishes conditions for the obtaining of an entry visa:

“1. Apart from the documentation referred to in article 6, and in addition to an entry visa, a foreign citizen shall comply with the following requirements:

- a) ...
- b) ...
- c) ...
- d) ...
- e) Others considered necessary”

It seems to us that Article 16 (1) (e) of L5/93 envisages that the Immigration Services may increase the number of documents or requirements considered necessary. From this point of view, the demanding of pre-approval, as a procedure or as an additional document for the granting of an entry visa, would be legal.

²⁹ L5/93, Article 9.

3.3 Competence for the issuing of visas

L5/93, Article 8 establishes that the entities which are competent to issue visas are:

- a) The Ministry of Foreign Affairs;
- b) The Immigration Services;
- c) embassies and consulates.

However, in 2006, the Regulations on this Law:

- a) introduced another entity for the issuing of specific types of visas, namely, border posts, which started to issue border visas; and
- b) clarified the set of competencies for the issuing of visas.

In relation to the clarification of the set of competencies for the issuing of visas, D38/06, established the following:

- a) The Ministry of Foreign Affairs and Cooperation has the competence to grant diplomatic, courtesy and official visas;
- b) The Immigration Services are competent to grant student, border, business, work, transit, tourism, residence and visitor's visas.
- c) With the exception of border visas, visas may be issued at embassies and consulates of the Republic of Mozambique.

From the subparagraphs above, we conclude that Immigration is competent to issue the more common visas, such as business and visitor's visas, amongst others. However, in practice and in accordance with what is permitted by law, embassies and consulates have been issuing these visas.

Despite the above, the obligation to issue visas is not expressed as an obligation of embassies and consulates, but rather as an obligation of the Immigration Services.

Reinforcing this understanding, Presidential Decree 12/95 of 29 of December states that the Ministry of Foreign Affairs and Cooperation should, in the diplomatic and consular domain, grant diplomatic, official and courtesy visas to foreign citizens.

Therefore, we are dealing with something which the law permits - embassies and consulates being allowed to issue the more common types of visas, such as business and visitors' visas, with the exception of border visas, provided that they consult with the Immigration Services beforehand.

4 ANALYSIS OF PRACTICES IN VARIOUS PROVINCES, IN RELATION TO THE OBTAINING OF A “TERMO DE RESPONSABILIDADE” (PRE-APPROVAL)

The table below indicates the current procedures for obtaining pre-approval for the issuing of an entry visa. Note that we have analyzed the procedures in Maputo City and in the Provinces of Inhambane, Cabo Delgado, Nampula, Sofala and Tete.

4.1 Table of requirements for obtaining pre-approval for the issuing of visas

Location	Requirements	Time taken to issue a visa
<p style="text-align: center;">Maputo City</p>	<ul style="list-style-type: none"> ▪ Application letter requesting a visa, addressed to the embassy/consulate; ▪ Letter of acceptance of responsibility, addressed to the embassy/consulate; ▪ Letter addressed to Immigration, requesting the issuing of an authorization for the issuing of a visa; ▪ Copy of company documents. 	<p style="text-align: center;">3 days to 1 week</p>
<p style="text-align: center;">Province of Inhambane</p>	<ul style="list-style-type: none"> ▪ Application letter requesting a visa, addressed to the embassy/consulate; ▪ Letter of Acceptance of Responsibility addressed to the embassy/consulate; ▪ Copy of the applicant’s passport; ▪ Copy of the I.D of the representative of the inviting company; ▪ Inviting company’s business license. 	<p style="text-align: center;">1 week to 4 weeks</p>
<p style="text-align: center;">Province of Cabo Delgado</p>	<ul style="list-style-type: none"> ▪ Application letter requesting a visa, addressed to the embassy/consulate; ▪ Letter of Acceptance of Responsibility addressed to the embassy/consulate; ▪ Copy of the applicant’s passport; 	<p style="text-align: center;">1 to 2 months</p>

Location	Requirements	Time taken to issue a visa
	<ul style="list-style-type: none"> ▪ Copy of the I.D of the representative of the inviting company; ▪ Inviting company's business license. 	
<p style="text-align: center;">Province of Nampula</p>	<ul style="list-style-type: none"> ▪ Application letter requesting a visa, addressed to the embassy/consulate; ▪ Letter of Acceptance of Responsibility addressed to the embassy/consulate; ▪ Copy of the applicant's passport; ▪ Copy of the I.D of the representative of the inviting company; ▪ Inviting company's business license. 	<p style="text-align: center;">2 weeks</p>
<p style="text-align: center;">Province of Sofala</p>	<ul style="list-style-type: none"> ▪ Application letter requesting a visa, addressed to the embassy/consulate; ▪ Letter of Acceptance of Responsibility addressed to the embassy/consulate; ▪ Copy of the applicant's passport; ▪ Copy of the I.D of the representative of the inviting company; ▪ Inviting company's business license. 	<p style="text-align: center;">30 days</p>
<p style="text-align: center;">Province of Tete</p>	<ul style="list-style-type: none"> ▪ Application letter requesting a visa, addressed to the embassy/consulate; ▪ Letter of Acceptance of Responsibility addressed to the embassy/consulate; ▪ Copy of the applicant's passport; ▪ Copy of the I.D of the representative of the inviting company; ▪ Inviting company's business license or articles of association, as published in the Official Gazette; 	<p style="text-align: center;">30 days</p>

[The information contained in the table above was not obtained in an official manner, but by means of conversations and telephonic contact with the employees of the Provincial Immigration Services, regarding current practices. Note that the information above may change, in accordance with the discretionary powers of the authorities.]

4.2 Analysis of the practices in various provinces, in relation to the obtaining of approval

Having analyzed the current practices of the Immigration Services in the provinces indicated in the table above, we conclude as follows:

a) Requirements

Requirements, in terms of the documentation requested for the process of pre-approval, are practically the same in all provinces. One or two provinces add, as a requirement, the articles of association published in the Official Gazette. The majority of the provinces require a pre-approval application to be submitted in duplicate.

b) Fees

The legality of the fees charged needs to be clarified.. For this purpose, we need to take into consideration that Maputo City does not currently charge any fee for pre-approvals, but would like to charge such a fee. However, all of the provinces listed above in the table charge fees of 519,12 MT (five hundred and nineteen Meticaís and twelve cents), 593,00MT (five hundred and ninety three Meticaís) or 600,00MT (six hundred Meticaís).

With respect to the legal basis for the fee, it is not clear if it is covered by Ministerial Diploma 18/2007 of 9 February, which updated the fees charged by the Immigration Services.

Annexure II of the abovementioned diploma sets in relation to 3-month, multiple-entry visas, an amount of five hundred and ninety three Meticaís and twenty eight cents (593.28MT) as a fee. However, the said Annexure established this amount as payment for acts and services rendered to the public, and then lists such acts and services. The title of the table states that the amounts contained therein are fees for “execution” (issuing). Thus, assuming that the fee is charged for the execution of the actual visa, the fee charged by the Provincial Directorates is not covered by this legislation.

In Annexure II, the amount charged for a 3-month visa is for the execution (issuing) of it , and not for the granting of a pre-approval. Seeing that a foreign citizen must already pay for the issuing of the visa at the embassy or consulate, this may well constitute a surcharge, to be paid for the same service.

For this purpose, Provincial Directorates should display tables of fees for services at the public service establishment, including the fees to be charged for pre-approvals, in order to better clarify this question – given that individuals have a right to be informed of the fees which are to be paid.³⁰

³⁰ D30/2001, Article 39(b)

c) Procedures

Once a request has been submitted to the Provincial Directorate, the Immigration officials submit it to the central services in Maputo, internally, for the purpose of processing, and once an order (*despacho*) has been issued, this is resent to the Province, so that it can be handed to the person acting on behalf of the visa applicant, or his/her representative, and to the embassy or consulate at which the application was submitted.

The notice of approval handed to the person acting on behalf of the applicant or his/her representative should also be sent to the foreign citizen, for submission at the embassy or consulate, as a precaution. Thus, if the Central or Provincial Services do not communicate internally with the embassy or consulate to which the entry visa request was addressed, the applicant can do so, using the notice sent to him/her.

5 INFORMATION COLLECTED FROM CERTAIN MOZAMBICAN EMBASSIES AND CONSULATES REGARDING THE OBTAINING OF PRE-APPROVAL

Note that during the drafting of this report, and for the purposes of it, officials from certain embassies and consulates, according to the table below, affirmed that there was no need to request pre-approval from the Immigration Services for a visa application.

Below, we indicate those Mozambican embassies and consulates consulted, as a sample, for the purposes of determining the general applicability of pre-approval as a requirement for the issuing of visas.

Country	Need for pre-approval	Types of visa	Nationalities
Germany	Yes	All	Citizens from West Africa, Pakistan, India, China and Arab countries
Belgium	No	-	-
Botswana	Yes	All	Citizens from West Africa, Pakistan, India, China and Arab countries
South Africa – Cape Town	No	-	-
Ethiopia	Yes	All	Citizens from West Africa, Pakistan, India, China and Arab countries
France	Yes	Work and Residence	All
Italy	Yes	All	Citizens from West Africa, Pakistan, India, China and Arab countries
India	Yes	Work, Residence and Business	All
South Africa – Pretoria	Yes	Work, Residence	Citizens from African countries

		and Business	
United Kingdom	No	-	-
Switzerland	No	-	-
Zambia	No	-	-
Zimbabwe	Yes	Work	All

We can assume that those embassies and consulates that do not demand pre-approval from the Immigration Services have been proceeding in accordance with prior practice, and that this practice has been gradually changing, at all of the embassies and consulates abroad.

6 STUDY OF COMPARATIVE LAW

The table below aims to analyze current legal practice in other countries, for the purposes of comparison with the current Mozambican system. The countries which have been considered for the purpose of this analysis are Malawi, Portugal, Angola, São Tomé and Príncipe and South Africa.

6.1 Table of Comparative Law regarding the practice of requiring pre-approval

Country	Practice	Time taken to issue a visa	Remarks
Malawi	The paperwork is submitted to the Consular Services, which will then contact the Immigration Services in Malawi in order to obtain approval from this institution and subsequently issue the visa.	The issuing time for a business visa can vary from 2 to 5 days.	The system in Malawi does not include the practice of requesting pre-approval for the issuing of visas, as happens in Mozambique (where the applicant submits a request to the Immigration Services for the issuing of pre-approval, and subsequently submits the visa request to the consulate). In Malawi, a visa application is submitted to the Consular Services and is processed within the Consular Services.
Portugal	All visa applications require the pre-approval of the Ministry of Foreign Affairs, or the <i>Serviços de Estrangeiros e Fronteiras (SEF)</i> , depending on the type of visa. ³¹		Only for the issuing of visas with “long-term validity II” (i.e., exceeding 6 months) must the applicant (e.g., a company) in Portugal visit the SEF and submit a visa application on behalf of a person who is abroad, after compiling the necessary

³¹ As a general rule, Portuguese consulates issue 2 types of visas: short term visas (valid for 3 months) and long term visas, which are divided into 2 types (visas valid for 6 months and visas valid for more than 6 months). For the issuing of a short term visa (up to 3 months) the consulate receives the visa request internally, and consults the Ministry of Foreign Affairs, which oversees the embassies and Consular Services); this institution then authorizes the issuing of the visa, and the consulate issues the visa; For the issuing of a “long term visa I” (valid for more than 3 months and for less than 6 months), the visa application is submitted to the consulate, and this entity submits the application for approval by the *Serviços de Estrangeiros e Fronteiras -SEF* (which corresponds to the Immigration Services in Mozambique), which then decides upon the application, and authorizes the consulate to issue the visa, or orders it not to do so.

Country	Practice	Time taken to issue a visa	Remarks
			documents. The SEF will then analyze the process and issue an order (“despacho”). This order (of approval or rejection) is sent to the following entities: the Ministry of Foreign Affairs, the consulate and the applicant.
São Tomé and Príncipe	<p>As a general rule, the embassies and consular posts of São Tomé and Príncipe have autonomy to issue visas.</p> <p>Only for residence visa applications,³² and for cases involving national security and public order, does the issuing of a visa require the pre-approval of the <i>Serviços de Migração e Fronteiras</i>.</p>		The <i>Serviços de Migração e Fronteiras</i> have a maximum time period of 60 days within which to issue a prior opinion on the visa application, failing which its opinion will be deemed to be favorable.
Angola	<p>As a general rule, embassies and consulates of Angola, throughout the world, do not have autonomy to issue visas, except for short term visas (valid for 7 days).</p> <p>In the case of consular visas (valid for more than 7 days), the paperwork is submitted to the Consular Services, and the consulate sends a scan of the application to the <i>Serviços de Migração e Estrangeiros</i> in Angola, which analyze the application and issue an authorization which is</p>	<p>For visas valid for up to 30 days: 48 hours.</p> <p>For visas valid for periods exceeding 30 days: 1 week.</p>	In the Angolan system, the pre-approval system is also internal, and applies to visas which are valid for periods exceeding 7 days.

³² In the case of a request for a residence visa, the opinion may be negative if the applicant has been sentenced to a prison sentence exceeding 6 months.

Country	Practice	Time taken to issue a visa	Remarks
	communicated to the consulate, which subsequently issues the requested visa.		
South Africa	The embassies and consulates of South Africa, throughout the world, have autonomy to issue visas, i.e., an applicant submits his/her visa request to the consulate/embassy, and the documentation is analyzed internally. The Immigration Services in South Africa may be consulted, but there is no legal obligation to do so, and it is subsequently decided whether or not to issue the visa.	Visas are issued within 5 to 10 days.	In the South African system, pre-approval by the internal services for the issuing of a visa does not exist. Embassies and consulates only issue visas for national citizens of the country in which they are established, or for foreigners who are resident in that country.

6.2 Analysis of Comparative Law regarding the legal practice of pre-approval

Some of the countries referred to above have a system requiring pre-approval for visas to be granted by the respective Immigration Services in that country. However, this pre-consultation is carried out internally, as between the embassy or consulate and the Immigration Services - as in the case of Malawi, amongst others.

In comparison, in Mozambique, pre-approval is requested by a person acting on behalf of the visa applicant, or by his/her representative - which implies a bureaucratic process, involving the submission of documentation (as well as the additional fee which is paid in some of the provinces for the issuing of the pre-approval).

The current model in force in Mozambique is equivalent to that used in Portugal in the case of a certain type of visa, namely, a “long term visa II” (for a period exceeding 6 months). However, in Mozambique, for applications for visas for periods of less than 6 months, pre-approval may also need to be requested, depending on the Mozambican embassy or consulate at which the applicant submits the visa application.

Thus, in some countries, Mozambican embassies and consulates demand pre-approval for all visas, while others require it only for certain types of visas, for example, for work and residence visas. This last model, adopted by the French Embassy, for example, is similar to the model of São Tomé and Príncipe, where pre-approval is only required for cases of residency.

The following needs to be clarified urgently, in a uniform manner:

- a) At the level of Mozambican embassies and consulates, whether pre-approvals should be required for all types of visas, or only for some;
- b) At provincial level, the requirements for pre-approvals.

From our analysis of the law, our understanding is that:

- a) pre-approval should be required for all types of visas; and that
- b) no request for pre-approval should be submitted to the Provincial Directorates by a person acting on behalf of an applicant or by his/her representative. The Mozambican embassy or consulate should instead consult the Immigration Services in Mozambique, internally, before it processes the visa application, as is done in other countries.

However, we are of the opinion that if consultation does become internal, the issuing of visas will take more time, due to a lack of technological capacity on the part of the Immigration Services, and that the system currently in force, once it is well defined in relation to deadlines and fees, would work better for Mozambique.

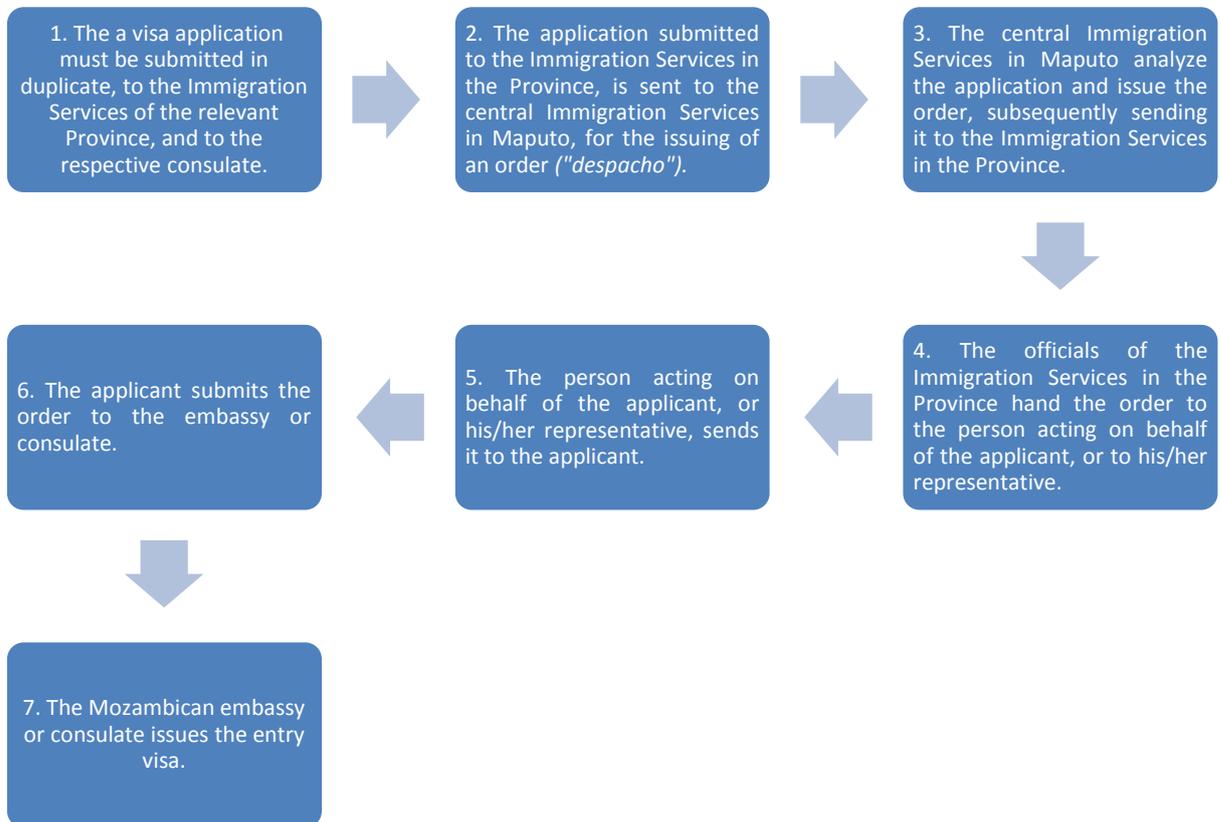
7 PROBLEMS IDENTIFIED AND RECOMMENDATIONS

Taking into account the provisions which are currently in force, and which regulate the stay, entry and exit of foreign citizens in Mozambique, and having being informed of some of the related matters which cause companies the most concern, we have identified various issues which merit attention, and which are listed in the table below.

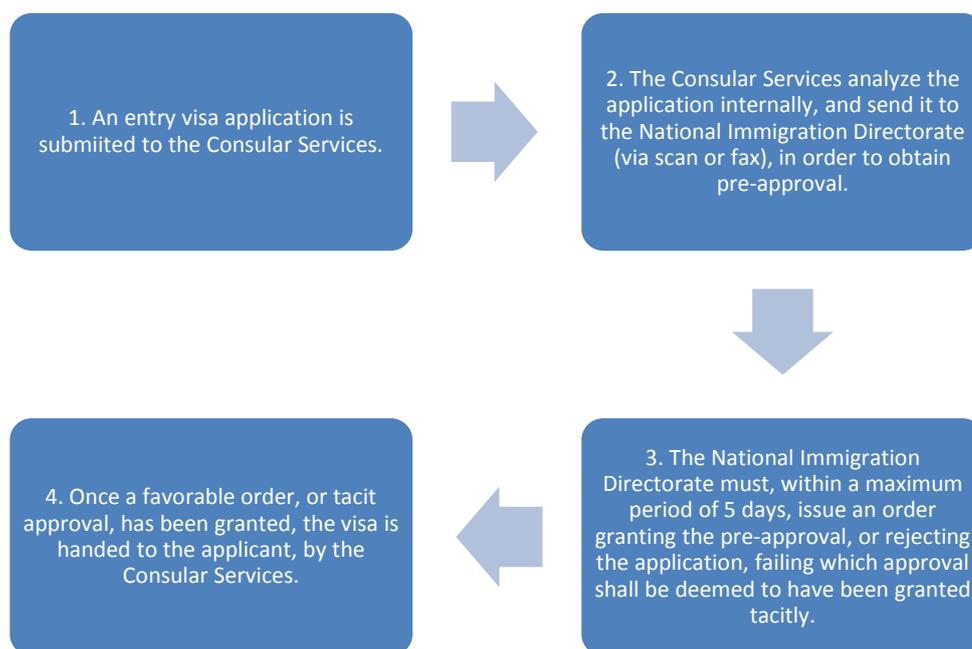
Problem	Recommendations
A tendency for there to be a lack of standardization of procedures in the various provinces in Mozambique, as regards pre-approvals for visas.	A possible solution would be to liaise with the Immigration Services, so as to request that any recommendations at central level be addressed to the provinces, and displayed, in the form of a notice or circular, at the respective service office, for the information of the public in general.
Lack of standardization of visa requirements (including as regards pre-approvals) in various embassies and consulates abroad.	A possible solution would be to request the Immigration Services to make use of a website, for the purpose of publicizing the requirements of embassies and consulates abroad.
Lack of written notification of the need for pre-approval from the Immigration Services, for the issuing of visas by embassies.	<p>There is no general electronic system for the providing of notification of new practices or legislation, by the various institutions.</p> <p>This could be done by way of a website or general portal, with which all of the various institutions are registered.</p>
Excessive delay in processing pre-approvals, at some of the Provincial Services.	As the deadline for the issuing of a pre-approval is not defined by Law, and is at the discretion of the Immigration Services, it is imperative that a deadline be defined.
Lack of a legal diploma providing clarity as regards the charging of fees established for the processing of pre-approvals.	Since a foreign citizen must already pay a fee for the issuing of a visa at an embassy or consulate, pre-approval by the Immigration Services should not include a fee, given that the pre-approval forms part of internal procedures for the granting of a visa. There is also no clarity regarding the application of the current fee.

8 PROPOSAL FOR A NEW SYSTEM

8.1 Visa pre-approval procedure currently in force in the majority of provinces



8.2 Proposal for pre-approval applications



The current law already contains steps 1 and 2 above.

In the case of steps 2 and 3, this proposal would imply an amendment of the Law, as regards the tacit approval proposed above - which is intended to speed up the process - given that tacit approvals must be provided for in specific legislation.³³

In relation to the fact that the law does not stipulate a deadline for the processing of visa applications, the general public administration rules will apply, which provide for a period of 15 days, counting from the date of the order (“despacho”).³⁴

However, for the purpose of the above proposal, we would also have to amend the law in order to establish a specific timeframe (5 days) for the issuing of a pre-approval.

Bearing in mind that any amending of the Law is a lengthy process, and in order for us to put an effective and swift scheme into place within a short timeframe, the ideal would be to define the current pre-approval system implemented by the Immigration Services, as it relates to:

- a) recommendations at the central level, addressed to the provinces, being displayed, by means of a notice or circular, at the respective services, for the information of the public in general;
- b) compliance with the general rules of public administration regarding the displaying of fee tables at public service offices, and in the processing of applications. (As such, knowing that pre-approval will not take more than 15 days, applicants for entry visas, could more easily arrange their trips);

³³ D30/01, Article 60

³⁴ *Ibid*, Article 58 (5)

- c) recommendations at an international level which are to be implemented by embassies and consulates abroad, being publicized on a website created for this purpose, by means of a government or other portal, in an attempt to ensure standardization of procedures at a consular level;
- d) agreeing on those situations in which pre-approvals may be waived, in cases involving applicants who have agreements signed with the Government³⁵ which contain a clause regarding the facilitation of visas by the Government;
- e) agreeing on exceptional or urgent situations in which a pre-approval may be waived, when duly justified, as in cases involving the death of a family member, urgent medical treatment, acknowledgement of the good reputation of the applicant and the performance of professional and commercial commitments, when it has not been possible to determine, beforehand, that a visa is required; and
- f) agreeing on those regular situations, in which pre-approval will not be necessary, i.e., when an applicant has visited the country very recently.

³⁵ Technical Cooperation Agreements, Memoranda of Understanding, Mining Concession Contracts and Investment Projects, amongst others.

9 CONCLUSIONS AND FINAL RECOMMENDATIONS

This report has been drafted in response to DAI SPEED's request, to SAL e Caldeira Advogados, Lda. (S&C), for consultancy services in relation to the clarification of matters related to a "termo de responsabilidade" (understood to mean a pre-approval) as a requirement for the obtaining of a visa.

As the monitoring of migration is the task of the Immigration Services, and as there has been an increase in the entry of foreign citizens into Mozambique, the reasons for the search for legal mechanisms with which to facilitate more effective control of this phenomenon, are clear.

Although our law expressly establishes that the granting of visas by embassies and consulates requires pre-approval from the Immigration Services, it does not establish any mechanism or procedure relating to how the process of pre-approval should occur.

Because the law does not define this formality, there is room for the creation of mechanisms and procedures by the immigration authorities. As a result, instead of there being internal consultation between the Consular Services and the Immigration Services, a mechanism has been instituted whereby a person acting on behalf of a visa applicant, or that applicant's representative, submits a request for pre-approval for an entry visa, at the Immigration Services.

However, it must be understood that the pre-approval process, as described above, is turning into a condition for the obtaining of an entry visa, and that this process does have a legal basis, in that the law determines that the requirements for the obtaining of an entry visa may include "others deemed necessary", in addition to those listed in the law.

In relation to the charging of a fee by the Immigration Services, when granting a pre-approval - the legal basis for which seems to be found in Annexure II of Ministerial Diploma 18/2007 - Immigration should display a table of fees in the public service office, as established by law, so as to clarify this aspect.

However, there is an issue of logic involved: if pre-approval is an integral phase of the visa application, then it does not make sense for there to be an extra fee, seeing that an applicant for a visa must already pay for that visa to be issued at the embassy or consulate. We understand that pre-approval is not an integral part of a visa application, falling within the scope of the prior consultation which must take place at Immigration - as this should, supposedly, take place with embassies and consulates. The process of pre-approval, in the form in which it is conducted by institutions, or in any other form in which it comes to be so conducted, is a prior condition for the obtaining of an entry visa.

During the drafting of this report, a study of other legal regimes was conducted as regards the institution and processing of visa applications.

We note that there are countries which have a system, requiring prior consultation with the respective Immigration Services, which has been established by law in such a way as to speed up the issuing of visas. In São Tomé and Príncipe, the law stipulates a deadline, and once this has elapsed, the opinion is held to be positive (or tacitly approved). In Portugal, similarly to what happens in Mozambique, the pre-approval process is only applicable to "long term visa II" applications (for visas which are valid for more than 6 months).

Angola makes use of internal consultation between the Consular Services and Immigration. However, it seems that, administratively, Mozambique has opted for the current system because of technological limitations.

We conclude, also, that some of the Mozambican embassies or consulates abroad are implementing the pre-approval procedure for all types of visas, while others are not, or are only using it for certain types of visas.

This lack of uniformity arises from a lack of clarity in the law, as regards the question of whether pre-approval applies to all visa types, or not.

From the study conducted in this report, we can conclude that there is no provision in the law that establishes that prior consultation is only required for certain types of visas, and therefore, we understand that pre-approval may be required for all types of visas.

On the basis of the issues here presented (in light of the experience of the countries mentioned above, in relation to pre-approval), and of our understanding of the need for a transparent regime, which would be capable of adequately regulating the question of pre-approval, our first choice would be the revision of D38/06, so as for it to include, amongst other aspects, the following:

- i) The requirements and procedures for the obtaining of pre-approval – which would permit the harmonization of requirements and procedures, at all Provincial Services;
- ii) Exceptional situations in which pre-approval may be waived - which would facilitate the entry of foreign citizens for whom this is urgent; and
- iii) Tacit approval – on termination of the deadline, the result of the pre-approval application should be deemed to be favorable to the applicant.

Given that any amending of the law is a lengthy process, and in order for us to put an effective and swift scheme into place within a short period of time, the ideal would be to define the current pre-approval system implemented by the Immigration Services, in relation to liaison with the Ministry of Home Affairs in order to clarify processing deadlines, and to those situations in which pre-approval should be waived - especially when an agreement has been concluded with the Government, placing an obligation on it to facilitate visas, and in other situations of an exceptional nature, as referred to in this report.

10 BIBLIOGRAPHY

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2. Mozambican Legislation

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- Law 4/2014 of 5 of February, which created the National Immigration Service (*Serviço Nacional de Migração – SENAMI*);
- Law 23/2007 of 1 August, which approved the Labor Law (“LL”);
- Law 5/93 of 28 December, which approved the norms on the entry into, stay in and exit of foreign citizens from Mozambique (Law 5/93);
- Decree 63/2011 of 7 December, which approved the Regulations on the Hiring of Foreign Citizens for the Petroleum and Mining Sector in Mozambique (Decree 63/2011)
- Decree 55/2008 of 30 December, which approved the Regulations on Mechanisms and Procedures for the Hiring of Foreign Citizens (“Decree 55/2008”);
- Decree 38/2006 of 27 September, which approved the Regulations on Law 5/93, (“Regulations on Law 5/93”);
- Decree 30/2001, of 15 October, which approved the operating standards of the Public Administration Services and revoked Decree 36/89, of 27 December (D30/01);
- Decree 38/2000 of 17 of October, regarding the creation of the border visa;
- Decree 18/96, of 11 June, which grants competency to the Ministers of Planning and Finance, and the Ministry of Home Affairs, to update the amounts of the fees owed for acts or services rendered by the Immigration Services;
- Presidential Decree 12/95, of 29 December which defines the objectives, attributes and competencies of the Ministry of Foreign Affairs and Cooperation;
- Ministerial Diploma 262/2010 of 14 of December, which adjusted the table which stipulated the fees for the granting, renewal and substitution of passports, visas and biometrically and electronically read DIRE’s, approved by Ministerial Diploma 140/2010, of 27 August;

- Ministerial Diploma 68/2001, of 2 May, which published the Charter of the Ministry of Home Affairs and revoked Ministerial Diploma 68/2001;
- Ministerial Diploma 18/2006 of 9 February, which updated, by a factor of 2.06, the specific fees contained in the tables which constitute annexures I to V of Ministerial Diploma 85/94 of June, charged by the Immigration Services.

3. Notices and Circulars

- Circular 01/DALF.F-DNM/2012, issued by the National Directorate of Immigration on 10 February 2012, regarding payment for services by means of a bank certified cheque;
- Circular 1 of 23 March 2013, issued by the National Directorate of Immigration, regarding new costs of immigration forms;
- Notice issued by the National Directorate of Immigration on 27 November 2013, regarding the collection of documents requested from Immigration, in person.

4. Foreign Legislation

- Law 5/2008 of 12 August – Law regarding the Legal Regime for Foreign Citizens in São Tomé and Príncipe
- Law 2/07 of 31 August - Legal Regime for Foreign Citizens in the Republic of Angola
- Immigration Law (Malawi) 1968, with 1988 amendments;
- Decree-Law 244/98, of 8 August, which regulates the conditions of entry, stay, exit and expulsion of foreigners from the national territory (Portugal);
- Decree-Law 4/2001 – Amended Decree-Law 244/98, of 8 August (Portugal).

5. Telephonic interviews

- Officials from various Mozambican embassies and consulates abroad;
- Officials from various Provincial Immigration Services in Mozambique.

6. Face to face interviews

- Interviews with clients of SAL & Caldeira Advogados, Lda. who have recently travelled to Mozambique.