

Mandatory Labor Certification for Avocado Exports Takes Effect

Mexico City, September 18, 2026

On September 15, 2026, Mexico's Ministry of Labor and Social Welfare (*Secretaría del Trabajo y Previsión Social*, the "STPS") published the General Operating Guidelines for the VELAGRO platform (the "Guidelines") and the Technical Resolution designating avocado as the first product subject to the Labor Certificate for Agricultural Exports (the "CLA").

The CLA is a labor and social security requirement for the export of certain agricultural products. Any individual or entity seeking to export a covered agricultural product must obtain the CLA, and the assessment also covers the participants in its value chain¹. The application process is carried out through VELAGRO, a digital platform administered by the STPS to submit and track applications, integrate value-chain information, and verify compliance with labor and social security obligations. Once issued, the CLA must be declared in the applicable export customs declaration (*pedimento de exportación*).

VELAGRO Operation and CLA Application Process

Under the Guidelines, individuals or entities seeking to export agricultural products subject to the CLA must register in VELAGRO using their valid electronic signature (*e.firma*), issued by the Tax Administration Service (*Servicio de Administración Tributaria*). They must also register on the platform the participants in the value chain associated with the export operation.

The STPS will verify compliance by all participants in the value chain and validate the relevant information through VELAGRO. The platform will interoperate with the systems of the Mexican Social Security Institute (the "IMSS"), the Ministry of Agriculture and Rural Development, and the Single Window for Foreign Trade Procedures, among others.

The STPS must resolve the application within five business days; failing which, the application will be deemed approved. If the application contains omissions or inconsistencies, the STPS may

¹ Value chain: an integrated set of economic, production, logistics, commercial, and service activities involved in the harvesting, packing, processing, transportation, marketing, distribution, and export of agricultural products.

issue a single deficiency notice. The applicant will then have five business days to cure the deficiencies; failing which, the application will be dismissed without prejudice to the filing of a new application.

The Guidelines provide for four types of CLA based on the applicant's level of compliance, and that of the participants in its value chain, with labor and social security obligations:

Type	Compliance level	Validity
A	90% to 100%	4 months
B	80% to 89%	3 months
C	70% to 79%	1 month
D	60% to 69%	1 month

Type A, B, and C CLAs may be issued up to three times in the same calendar year; a Type D CLA may be issued only once. If the minimum compliance level is not met, the CLA will not be issued, and a new application may be filed once the relevant obligations have been brought into compliance. If the STPS does not have sufficient information to classify the CLA, it may issue an unclassified CLA valid for up to three months on no more than two occasions during the same calendar year.

Pilot Program

Each covered agricultural product will be subject to a mandatory pilot program under which the obligations required to obtain the CLA will be introduced gradually. The phases, thresholds, and obligations will be established for each product and may be adjusted based on the results of implementation.

For avocado, the pilot program consists of five phases: (i) applicant registration; (ii) value-chain registration; (iii) progressive incorporation of IMSS employer registration numbers; (iv) phased application of the Technical Factor;² and (v) transition to the permanent regime.

The first phase began on September 15, 2026. CLAs will continue to be issued during the pilot program, and continuity of export operations will depend on obtaining the CLA in accordance with the applicable deadlines, requirements, and conditions. A single valid CLA may cover multiple export customs declarations, with no limit on the number submitted while the CLA remains valid.

² Technical Factor: a metric that establishes a relationship between the minimum amount of labor required at each stage of the value chain and the quantity of goods produced.

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