

Recommendation No. 4 National Trade Facilitation Bodies – Public Review Template for comments and observations

Please return completed templates to Project Editor, Khan SALEHIN: khan.salehin@unece.org

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| Comment Submitter: | Mr. Frank Heijmann Ms. Thy Nguyen | E-mail: | Fha.heijmann@belastingdienst.nl Tvt.nguyen@belastingdienst.nl | Delegation: | NL | Date submission: | 29/06/2015 |
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Please make all comments using this template.

Please propose suggested changes in order to make the Recommendation Draft align with your comments.

| Draft version number | Line numbers | Type of comment ¹ | Comments | Proposed changes | Working Group Observations (leave blank) | State (leave blank) | Ref. (leave blank) |
|---------------------------------|----------------|------------------------------|--|------------------|---|---------------------|--------------------|
| Final draft (for Public review) | 64 and further | Ge | Objective must be very clear. Moreover to reach a level of commitment, perhaps a letter of intent can be taken into account. Which parties will be involved or included? Think about a balanced representation from a government but also from a trader's (Customs-related) perspective. | | The text was left intentionally open in order to ensure that governments could choose which tools they want to implement, whichever will be appropriate for their context. Letter of intent, in other words, a contractual relation does not seem appropriate in all contexts. | No changes | 01 |
| Final draft | 246 B.4 | Ge | The model is theoretical, which is good. The distinct levels will assure different roles and responsibilities. However, theory is not reality, grey areas will occur, therefore, provide solutions or tools when roles or responsibilities get blurry. | | Scope of recommendation and guidelines are mainly directions or principles. It is difficult to capture every aspect of real life issues. Concrete examples would be very welcome (including relevant solutions or tools) and could eventually be addressed in a repository which is maintained by UNCTAD. | No changes | 02 |
| Final draft | 246 B.4 | Ge | What is very positive about the draft is transparency, partnership between | | In lines 118-119, this recommendation clearly addresses governments. The text does indicate that a 'lead agency' will | No changes | 03 |

¹ Types of comments: ge = general; te = technical; le = legal; ed = editorial

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| | | | <p>government authorities /agencies and traders/related trade service in the model. What is missing, is who is in the lead? Who will take initiative? In the end, equality is a noble thing, but somebody needs to be in charge. Please take into account or consider the WTO Agreement on Trade Facilitation (https://www.wto.org/english/tratop_e/tradfa_e/tradfa_e.htm#tradfac)</p> | | <p>be present with a clear role (lines 466, 459, 379, 254, 250...) The recommendation does not prescribe which agency or entity should take the lead as this could be different depending on the country and the context. The reference to the WTO TFA is not clear; which articles are being pointed to.</p> | | |
| Final draft | 305 C | Ge | <p>A very important task is granted for the (executive) secretary to coordinate NTFB's at a regional and global level. Without any coordination, there will be a risk for NTFB's becoming different islands. Besides this, what is de added value for a TFB on global level?</p> | | <p>Line 408 mentions 'regional or global organization' and should be changed to 'regional or global level'. Given the NTFB includes all relevant stakeholders, the secretary would be the most suited as he or she would have the macro or complete picture of a country's standpoint. Concerning the value added of a Global TFB, the project team believe they are not suggesting to have a new one but to represent at global levels. The necessary coordination could be different from region to region and examples within a repository would be most welcome to provide further guidance.</p> | No changes | 04 |

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| | | | | | Concerning the added value for TFB on a global level: The project team wanted to intentionally leave the text open and do not feel that a special text is necessary on the interest of a global level coordination. This is already integrated into the WTO TFA (article 23) for example. Bodies at national level will have a platform at the global level to maintain transparency, synergy, collaboration, coordination and cooperation. | | |
| Final draft | | Ge | | Need for a roadmap, who/what/when/how to implement a NTFB. | Lines 458-489 already provide a general idea of a roadmap. Again, the project team did not want to create a text which was too prescriptive in order to leave a certain level of flexibility to different countries and contexts. Furthermore, country experiences on how they actually rolled out their NTFB could be provided within a repository A separate roadmap is currently being developed by the UNECE and will likely be published in the very near future. | No changes | 05 |

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