

Consultation Approaches Proposed Recommendation – Public Review Template for comments and observations

Please return completed templates to Working Group Chair, Josephine BAIAMONTE: JOSEPHINE.BAIAMONTE@cbp.dhs.gov

Comment Submitter:	Mitsuru Ishigaki JASTPRO on behalf of Japan Committee for UN/CEFACT Standards	E-mail:	m-ishigaki@jastpro.or.jp	Delegation:	Japan	Date submission:	3 rd Sept. 2014
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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 version-1	146-158	ge	<p>For the purpose of undertaking effective consultation process, we believe essential and indispensable knowledge based on expertized experience is fully incorporated in this guideline and we have no doubt that this document will be a good and helpful guide for all the related public and private parties.</p> <p>In the meantime, we have a keen concern about whether it is proper or not for UN/CEFACT to treat this document as a new UNECE recommendation.</p> <p>Many recommendations have been generally produced to recommend parties to take a distinct action such as applying/reviewing/amending rules, establishing a certain organization etc., but this ‘Consultation Approach’ is focused to provide a good knowledge and methodology for carrying out consultation ‘effectively’.</p> <p>We hope UN/CEFACT will clarify the definition of Recommendation, Guideline, White Paper, Notes etc.</p>		<p>The work group would like to proceed in moving this forward as a separate recommendation for the following reasons: (1) If Consultation approaches becomes an annex of another work, such as Recommendation 4, there is a risk that the meaning of the recommendation will be lost; (2) the recommendation is intended to stress the availability of different approaches to trade consultation; the key concept of the document is the flexibility of approaches. (3) This is distinguishable from Recommendation 4 which addresses how to organise a specific type of fora for consultation. Currently many governments are tackling the issue of Single Window and data harmonization. Trade consultative measures is at the heart of these</p>	M	1

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

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					discussions, without which, these efforts cannot succeed. In this regard, it is essential that governments understand the criticality of trade consultative measures and the various tools that are available to them. (4) With regard to proceeding as a “white paper,” currently there is no such mechanism under UN/CEFACT. The draft recommendation as proposed has a very clear recommended practice which is in line with former Trade Facilitation recommendations. It is not clear what other type of deliverable could propose the same type of guidance at this level.		
	83	ed	UNECE Recommendation No.4, National Trade Facilitation Organs should be ‘Bodies’		This question will be discussed with/within the Secretariat. A suggested approach will be provided.	D	2
	570	ed	‘an operational level’ should be ‘a Strategic level’.		It was decided to rename operational to ‘technical’ (see comments from T. Butterly)	R	3
	571	ed	‘a strategic level’ should be ‘an operational level’.		The layers were slightly renamed (see comments from T. Butterly)	R	4

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Comment Submitter:	Tom Butterly, Chief of the Global Trade Solutions Section, UNECE	E-mail:	Tom.butterly@unece.org	Delegation:		Date submission:	25 July 2014
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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 version-1	486-530	ge	The concept of the three operational layers is very powerful. This is one of the most significant contribution of the paper. Within this are, it may be useful to mention in the text the need to occasionally have all 3 layers together at a meeting - recognising of course that this is the exception rather than the rule. A simple vertical two way arrow on the diagram could indicate this well.	Specifically mention that these layers interact. Add a vertical two way arrow (on page 19 to figure 1) Rename layers: - Strategic - Operational - Technical	Agreed	I	5
	486-530	ge	I mention that the senior political engagement is at the strategic layer and this is where the Minister attends to set the strategy and goals, objectives (SMART), and where specific time based tasks are assigned to individual Ministries and or groups. I stress that the this strategic layer only needs to meet occasionally to monitor progress and take corrective action if necessary. The Operational layer is the production management and the technical layer takes care of specific technical tasks such as establishing a single window to achieve a higher strategic objective (eg specific TF enhancements).	Insert this text from line 501	Agreed	M	6
	604	ge	The tool kit seems rather shallow at present. Can I presume that you will be developing these further for the final publication?	Specific tools to be mentioned. (tool could be way of doing things)	Explanatory/introductory text will be added between lines 604-605 as per the suggested changes	M	7

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	605-635	ge	Of particular interest is the stakeholder analysis section - it would be really helpful if more guidance on the approach to this was provided.		A table on stakeholder analysis will be added to section 8.1 with a brief description	M	8
		ge	Create a repository of case studies		Agreed – will be developed to accompany the project.	M	9

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