

# WCO news

Issue 2 / 2023, No. 101

## Fragile Borders



## 4 FLASH INFO

- 4 Post-clearance audit: two new publications for Customs authorities
- 4 Upcoming WCO conferences - save the date!
- 5 WCO releases Illicit Trade Report 2022
- 6 The WCO Fellowship Programme is modernizing
- 8 A guide to developing HS skills
- 9 Operation SEASCAPE 2: results and review
- 14 Second edition of the Compendium on Gender Equality and Diversity in Customs
- 17 CLiKC! – new courses and new design
- 17 WCO Academy - the private sector's point of access to WCO expertise

## 18 DOSSIER: FRAGILE BORDERS

- 19 Enabling Customs in Fragile and Conflict-Affected Situations
- 22 Working against a security crisis backdrop: the experience of units in South-West Cameroon
- 28 The security crisis in Haiti and its impact on Customs
- 32 Inter-agency cooperation – the case of Argentina
- 38 UNOCT's Fusion Cells Programme – a model for inter-agency cooperation in counter-terrorism
- 43 A Borders Academy in Niger
- 48 Supporting humanitarian work: some recommended practices

## 52 PANORAMA

- 52 Morocco's Customs Service establishes special status for its officials
- 55 Gender Equality and Diversity: a look into the assessments made with Ghana, Togo and Côte d'Ivoire
- 58 GEA's Customs capability database
- 62 Fighting corruption in the form of gift-giving: the experience of Indonesia Customs
- 66 Finnish Customs experiments with the carbon footprint calculator
- 68 How India Customs contributes to data-informed decision-making
- 71 Turkish Customs response to earthquakes

## 74 FOCUS: DEVELOPING LEADERSHIP AND MANAGEMENT SKILLS

- 75 Testimony of a facilitator
- 77 SARS partners with the WCO to strengthen leadership and management skills
- 82 An overview of Zimbabwe Customs' journey

## 84 POINT OF VIEW

- 84 Open Customs Blockchain: The missing piece to unlocking the broad application of distributed ledger technology for Customs?
- 90 Harnessing the power of the cosmos to detect illicit trade

**Editor / Writer** Laure Tempier

**Publication Assistant** Sylvie Degryse

**Online edition:** [mag.wcoomd.org](http://mag.wcoomd.org)

**Online subscriptions**

<http://www.wcoomd.org/en/media/wco-news-magazine/subscriptions.aspx>

**Advertising**



Bernard Bessis [bernard.bessis@bb-communication.com](mailto:bernard.bessis@bb-communication.com)

**Publisher**

World Customs Organization

Rue du Marché, 30, B-1210 Brussels, Belgium

Tel.: +32 (0)2 209 94 41 - Fax: +32 (0)2 209 92 62

[communication@wcoomd.org](mailto:communication@wcoomd.org)

[www.wcoomd.org](http://www.wcoomd.org)

**Editorial note**

WCO News is distributed free of charge in English and in French to Customs administrations, international organizations, non-governmental organizations, the business community, and other interested readers. Opinions expressed in WCO News are those of the contributors and do not necessarily reflect the official views of the World Customs Organization. Contributions in English or French are welcome. The WCO reserves the right to publish, not to publish, or to edit articles to ensure their conformity with the magazine's editorial policy and style. The WCO Communications Service is available to answer all requests for submission of contributions, subscriptions, and any other enquiries relating to WCO News.

Please email [communication@wcoomd.org](mailto:communication@wcoomd.org).

Copyright © World Customs Organization

All rights reserved. Requests and enquiries concerning translation, reproduction and adaptation rights should be addressed to [copyright@wcoomd.org](mailto:copyright@wcoomd.org).

**Acknowledgements** The Editorial Team wishes to express its sincere thanks to all who contributed to this publication.

**Illustrations** Our thanks also extend to all who provided photos, logos and drawings to illustrate this issue.

**Photo cover** © REINNIER KAZE / AFP

**Design** [www.inextremis.be](http://www.inextremis.be)



22 DOSSIER **Fragile Borders: the experience of units in South-West Cameroon**



28 DOSSIER **The security crisis in Haiti and its impact on Customs**



32 DOSSIER **Inter-agency cooperation: the case of Argentina**



77 FOCUS **SARS partners with the WCO to strengthen leadership and management skills**



84 POINT OF VIEW **Open Customs Blockchain: The missing piece to unlocking the broad application of distributed ledger technology for Customs?**





© AdobeStock

# Post-clearance audit: two new publications for Customs authorities

## Fraud detected through post-clearance audit and its techniques

This publication brings together information on various fraud cases discovered through post-clearance audit (PCA) in 2022. It explains how the fraud was committed and how auditors examined information in order to reveal the facts.

The focus is on providing information-gathering techniques (what financial accounts to look at in the accounting books, what business documents to check in the taxpayer's office and what questions to ask taxpayers in order to obtain information), and on information analysis techniques (what elements of Customs, Tax and other agencies' information are compared, and how to process, calculate and analyse the data).

The publication does not include cases involving errors/negligence, i.e. cases which are not fraud committed with a view to obtaining undue profits. By way of example, in the area of Customs valuation, omitting to add assists, commissions and royalty payments is a common error, but this is not dealt with here. Customs officers who would like to learn how PCA can reveal such errors may wish to read the guide entitled *How to Audit*.

Finally, the publication is not a collection of investigation techniques. In the case of irregularities serious enough to warrant criminal rather than administrative penalties, the Criminal Investigation Division should take action. Instead, the publication presents cases of administrative control uncovering, at a preliminary stage, irregularities leading to a criminal investigation. A "soft" approach of this kind opens the door for Customs to increase its detection of fraud, and it is essential to have such an approach in place, separately from criminal investigations.

## Common Audit Questionnaire

An audit questionnaire is often used by auditors to identify risk areas within a trader's business as part of their preparations for conducting an audit. The Secretariat has therefore developed a common questionnaire on the basis of national audit questionnaires, with contributions by some WCO Member Customs administrations.

### More information

<https://www.wcoomd.org/en/topics/enforcement-and-compliance/instruments-and-tools/guidelines/pca-guidelines.aspx>

## Upcoming WCO conferences - save the date!

- **Technology Conference & Exhibition**, 10 to 12 October 2023, Hanoi, Vietnam
- **Global Origin Conference**, 8 and 9 November 2023, Santiago, Chile
- **Sixth Global AEO Conference**, 8 to 10 May 2024, Shenzhen, China

### More information

[Events@wcoomd.org](mailto:Events@wcoomd.org)

# WCO releases Illicit Trade Report 2022

The WCO Secretariat has released the 2022 edition of the Illicit Trade Report, which provides an analysis of illicit trade dynamics through a meticulous examination of seizure data and case studies reported by some Customs administrations. The Report delves into seven key topics: money laundering and terrorist financing, cultural heritage, drugs, environment, intellectual property rights, health and safety, revenue and security.

The analysis primarily relies on data collected from the WCO's Customs Enforcement Network (CEN), a global database of Customs seizures and offences. The 2022 report also incorporates an expanded range of data and information

sources, including media, reports published by Customs administrations and international organizations, as well as a survey conducted by the WCO Secretariat to gather additional data from Customs administrations and WCO Regional Intelligence Liaison Offices.

The Report is currently available in English, and the French version will be available shortly.



# SETTING THE STANDARD, INSPIRING IMITATION



**PUBLICAN**  
DIGITAL SHIPMENT VETTING

**100% INSPECTION**

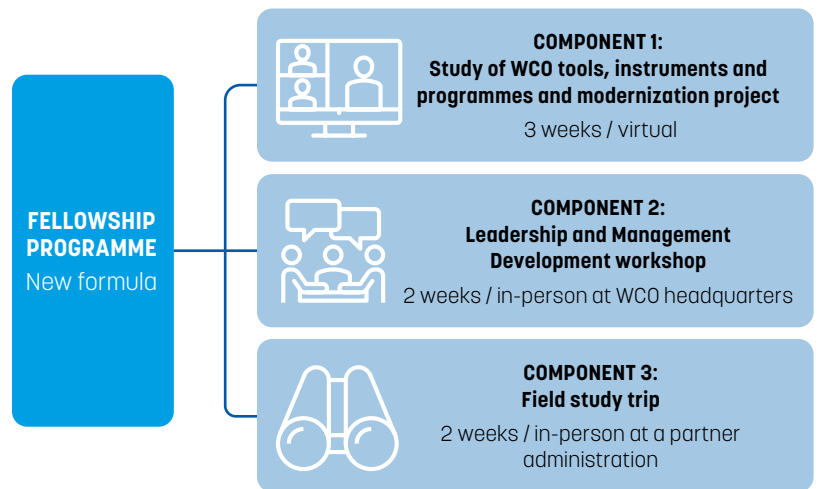
# The WCO Fellowship Programme is modernizing

The Fellowship Programme will combine online and in-person activities from September 2023 onwards. Already used for several activities, the method is expected to be cost-effective and to provide Fellows with an equally rewarding experience.

As with the rest of the world and other sectors, COVID-19 had a massive impact on business continuity at the WCO, and the Secretariat had to adapt to work with Customs administrations entirely remotely, including when providing technical assistance. As the remote working methods proved to be effective, some activities continued to be conducted virtually once travel restrictions were lifted.

To ensure overall consistency, the Secretariat engaged in a review process of the delivery modes of all capacity building activities and programmes. The goal was to determine which type of activities, depending on requirements and objectives, should be carried out remotely, in person or using a blended delivery mode (i.e. combining online/virtual and in-person components). During discussions at the February 2023 meeting of the Capacity Building Committee on *Assessing the effectiveness of the online, on-site and blended approaches to Capacity Building activities*, the Secretariat presented the results of the review and argued that using a blended approach, when possible, was cost-effective and offered sustainable results.

The method is to be applied to the Fellowship Programme from its 87th session for French-speaking officers, which is scheduled from 18 September to 3 November 2023. Launched in 1985, the WCO Fellowship Programme forms part of the WCO's initiatives to enable Customs officers from developing countries to acquire sound knowledge of internationally recognized Customs standards, techniques and practices, and to bolster their supervisory and management capacities so as to help them carry out reform and modernization within their respective administrations.






Under the traditional format, during their six-week stay, Fellows were made acquainted with WCO standards and tools, and undertook a research study on a Customs topic of choice (first component); participated in a Leadership and Management Development (LMD) workshop (second component); and visited a Customs administration for a practical field study (third component).

Under the new format, the first component is to be delivered entirely remotely, while the other components are to be delivered in a face-to-face mode. This formula was used during the COVID-19 pandemic, with the LMD workshop and field visits scheduled for when health and travel restrictions allowed. The duration of the programme has been slightly modified, with the programme extended by one week.

## More information

[capacitybuilding@wcoomd.org](mailto:capacitybuilding@wcoomd.org)  
[https://www.wcoomd.org/en/topics/capacity-building/activities-and-programmes/people-development/learning/development-programmes/fellowship\\_programme.aspx](https://www.wcoomd.org/en/topics/capacity-building/activities-and-programmes/people-development/learning/development-programmes/fellowship_programme.aspx)

## FELLOWSHIP PROGRAMME - New formula

WCO Fellowship Programme components and delivery method (7 weeks)				
Component		Delivery mode	Content	Duration
1		<b>Virtual activity</b> through online meetings, self-learning on CLiKC! and remote tutorship sessions	<b>Presentations of Secretariat activities and WCO tools and instruments</b> <b>Study of a specialized area and drafting of a modernization project</b> aimed at responding to an organizational or operational issue that has been identified in the Fellow's home administration	3 weeks
2		<b>In-person</b> at WCO headquarters	<b>Round table with the WCO Secretary General</b> <b>Experience-sharing sessions</b> during which each Fellow presents his/her administration and his/her research project <b>Leadership and Management Development workshop</b>	2 weeks
3		<b>In-person study visit</b> within a partner organization	<b>Field study trip</b> during which Fellows can observe how norms are implemented	2 weeks

Cognyte

# INCREASE CUSTOMS REVENUE COLLECTION WITH DECISION INTELLIGENCE

- + Discover customs fraud by fusing siloed data into a single pane of glass
- + Boost customs revenue based on ML-powered risk management
- + Optimize customs operations with strategic and operational decision intelligence

**NEXYTE** | EVERY  
**DECISION**  
COUNTS

Visit us at  
[www.nexyte.ai](http://www.nexyte.ai)





## A guide to developing HS skills

Classifying goods in the Harmonized System (HS) requires specific knowledge and skills, and, in some cases, a thorough understanding of the rules that govern it. While machine learning technology has enabled the development of various classification tools, these "are designed to assist classification and not to perform classification. So, it stands to reason that the results they produce will only be as good as the people who use them"<sup>1</sup>.

To guide Customs administrations in their efforts to train their staff, the WCO Secretariat has developed the *Strategic Guidance for Competency Development in the area of Tariff Classification of Goods for Customs Administrations*. The guidance outlines a four-level competency development plan (see table), including for each level:

- the competencies to be acquired,
- the training methods to be used,
- the relevant WCO tools,
- the number of hours required,
- capacity building activities conducted by the WCO and development partners that administrations can benefit from.

Not all Customs officers are required to reach level 4. However, those processing Customs declarations on a regular basis as part of their daily tasks should have reached at least level 2 (intermediate) following their induction training and initial placement, and "advanced" (level 3) within three to five years.

The Guide was developed by the team in charge of the the Harmonized System in Africa Programme, a programme funded by the European Union and implemented by the WCO Secretariat. It is available on the WCO website.

### More information

[wcoHSAfrica@wcoomd.org](mailto:wcoHSAfrica@wcoomd.org)

Levels	Short Description	Detailed Description
1	Beginner	At this level, the officer is only required to "know" the concepts related to the competency. The officer generally performs tasks based on instructions received and under supervision.
2	Intermediate	At this level, the officer is required to "know" and "understand" the concepts related to the competency. The officer can work without instructions but remains under supervision.
3	Proficient	At this level, the officer is required to "know", "understand" and "perform" the competency-related tasks autonomously.
4	Expert	At this level, the officer is required to "know", "understand", "perform", "train" and "provide strategic advice" on the competency-related activities and tasks. If an officer reaches level 4 for the competency "tariff classification of goods", he/she is often called upon to (i) deliver training, (ii) provide advice as part of technical committees related to advance rulings or appeals, and (iii) participate in regional and international meetings such as the WCO HS Committee.

<sup>1</sup> Randy Rotchin, *What impact is technology having on efforts to improve HS classification efficiency and accuracy?*, WCO News Edition 1 2022, <https://mag.wcoomd.org/magazine/wco-news-97-issue-1-2022/impact-technology-hs-classification-efficiency-and-accuracy>



# Operation SEASCAPE 2: results and review

An operation to combat counterfeiting and piracy, dubbed Seascope 2 and made possible by funding from Japan Customs, was organized by the WCO Secretariat in June 2022. It involved six Customs administrations from the Americas: Argentina, Brazil, Chile, Mexico, Panama and Peru.

As is the case for all WCO enforcement operations, there were several objectives. Among them, in particular, were those of enabling administrations to share tactical information, identify new fraud techniques and strengthen practical cooperation at national level with the other enforcement agencies and rights holders.

Five of the six participating Customs administrations declared cases of seizure/detention. In total, 118 cases, logged in 226 seizure reports, were reported, amounting to a total of more than 10.13 million articles. It is worth noting that one case can generate several reports. For example, where there are several different kinds of goods, there will be a separate seizure for each type of product. For the sake of comparison, during the first SEASCAPE operation in 2016, 4,569,935 articles were seized/detained, i.e. half the current figure, even though there were more participating countries (10 rather than six).

Articles suspected of infringing intellectual property rights were split among 16 categories. Of the total number of articles, 52% fell into a category called "other", which mainly includes face masks, hand tools and ball bearings. The other categories of articles with the highest volumes are mobile phones (17%), tobacco (12%), and games and toys (12%). The 10 brands most frequently involved are Disney, Adidas, Lego, Kingston, Apple, SKF, Toyota, Marvel, Pokémon and Nike.

## Preparatory workshop

Before the operation started, a preparatory workshop took place from 1 to 3 June 2022 with around 30 experts from the various countries, who reviewed risk assessment techniques

and the methods for distinguishing between genuine and fake goods. The National Contact Points attending the workshop were then asked to pass on the information gathered and the documentation provided to the frontline officers.

One day was set aside for representatives of the rights holders to present the main characteristics of the products of their brands, including packaging and the production and distribution chain.



Table 1 - Type of products seized/detained by quantity

Type of product	Quantity
Other - masks (5,219,250), hand tools (31,512), ball bearings (22,157), money boxes (1,800), machine components (476), thermos flasks (157), packaging (137), batteries (125), sporting goods (23)	5,275,637
Mobile phones and accessories	1,754,388
Tobacco (1 kg = 1 article)	1,229,215
Games and toys	1,209,247
Accessories	234,073
Beverages (1 l = 1 article)	221,661
Clothing (1 kg = 1 article)	74,579
Electronic appliances	46,354
Computers and accessories	33,231
Medicines (600 mg = 1 article and 100 ml = 1 article)	22,660
Watches	17,022
Transportation and spare parts	10,000
Footwear (1 kg = 1 article)	3,472
Pesticides (1 kg = 1 l = 1 article)	1,200

Eighteen of them were present: Colgate-Palmolive, Juul, Procter & Gamble, PMI, Diageo, Puma, Bayer, Servier, MF brands, Moderna, Merck, JTI Nike, Chanel, Tommy Hilfiger, Syngenta, Richemont and HP.

### Operational phase

From 5 to 30 June 2022, the participating Customs were asked to declare IPR-related seizures/detentions via the WCO's secure communication tool CENcomm. Information continued to be gathered on the cases reported until the end of September 2022. The information had to be as precise as possible. For instance, the following were to be reported:

- the precise quantities of goods seized for each brand;
- the type of intellectual property right infringed in terms of Community or national legislation (trademark, copyright, patent, etc.);
- the targeting criteria used and the sources of information (information passed on by the rights holders, seizure/detention report from another country);
- the routes taken (origin, place of dispatch, transshipment, transit, final destination, etc.);
- the concealment methods;
- photos of the packages and products intercepted;
- information on any arrests or prosecutions brought.

All means of transport were to be targeted (by land, sea and air), with particular focus on Customs-controlled areas at the major points of entry, such as:

- ports, airports and dry ports;
- Customs warehouses and other licensed premises;
- free zones;
- mail and express parcel services.



938,500 counterfeit masks for children were discovered in Peru.

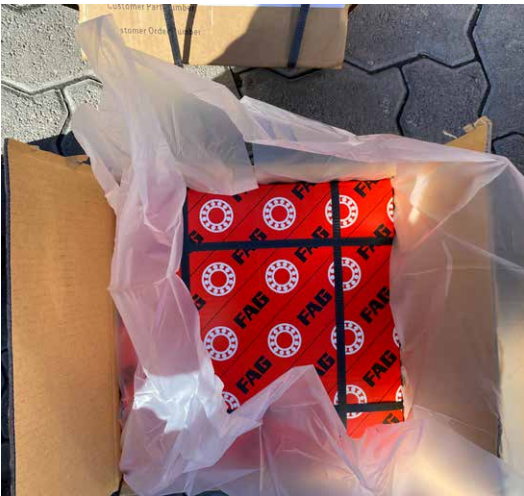
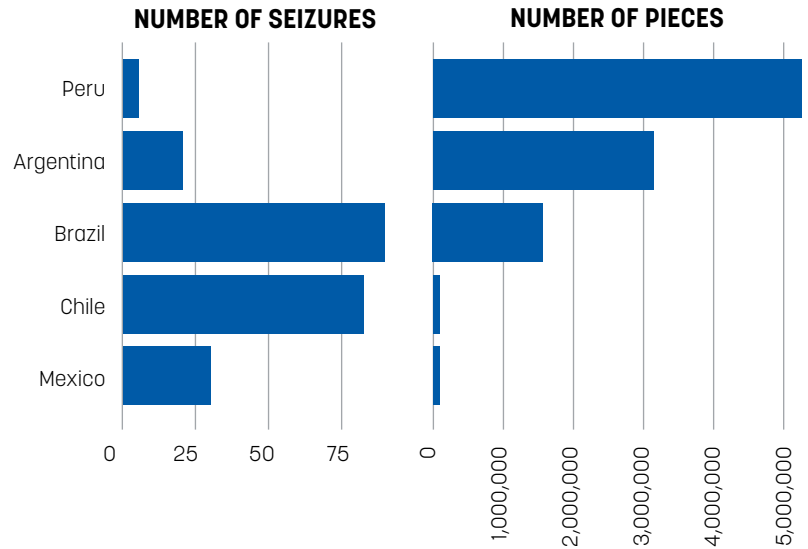


© Chile Customs.

**Results**

Peru Customs found 50% of the articles (i.e. 5.2 million articles) in five seizures carried out at a seaport. Argentina and Brazil also seized large quantities (3.1 million and 1.5 million articles respectively). In terms of numbers of seizures, Brazil and Chile reported 75% of the total.

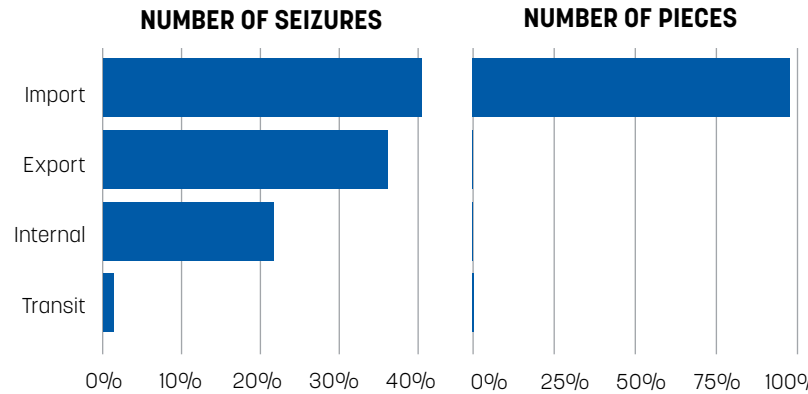
Figure 1: Number of articles and seizures/detentions



11,649 ball bearing units were discovered in Chile.

While 40% of the seizures were made at import, accounting for 98% of the articles discovered, the number of seizures was also relatively high at export (36%) and on the internal market (22%) for products already placed in free circulation.

Figure 2 - Number of seizures and numbers of articles by type of procedure





Some products, for example ball bearings and hair straighteners, did not comply with current quality and safety standards, and their use could have posed a threat to users. It is also interesting that the source country of 99% of the articles in the tobacco category was Paraguay, with the destination being Brazil.

### Review and recommendations

Most of the administrations that took part in the operation have an appropriate IPR legal framework. The WCO Secretariat experts observed a strong desire to ensure that it was respected, but they also noted a lack of resources allocated to the reporting of data on seizures/detentions, in particular as regards the outcome of investigations. Raising the public's awareness of IPR, so that people understand the advantages of intellectual property and the respect with which it should be treated, is another area of work to which Customs should contribute.

The experts also hope that the six administrations will continue to play an active role in the IPR CENcomm Group, which is open at all times and not only when high-profile operations



© Chile Customs.

---

*The WCO Secretariat experts also hope that the six administrations will continue to play an active role in the IPR CENcomm Group, which is open at all times and not only when high-profile operations are in progress.*

---

are in progress. For this purpose, they should designate a contact point to report on IPR-related infringements and non-compliance with health and safety standards. The contact point should also, on a daily basis, keep an eye on information obtained in the Group and send the information on to his or her administration's risk management unit. Field officers should also have access in order to be able to consult the information reported within the Group, including intelligence provided by rights holders in the "Rights Holders' Corner". It should be borne in mind that any accredited officer can gain access to CENcomm via the mobile app.

The WCO Secretariat is well aware of the substantial volume of work involved in entering data in CENcomm and in the Customs Enforcement Network (CEN). However, it has pointed out to its Members how useful these data are to improve targeting and reminded them of the commitments they entered into in this field when they adopted the "WCO Charter of Data Quantity and Quality Enhancement in the CEN"<sup>1</sup> in June 2021.

### More information

[iprteam@wccomd.org](mailto:iprteam@wccomd.org)

<sup>1</sup> See <https://mag.wccomd.org/magazine/wco-news-99-issue-3-2022/enhancing-data-collection>.

**Rapiscan**<sup>®</sup>  
systems

**AS&E**<sup>®</sup>

Part of the OSI Systems family of security companies

# CARGO SCANNING & SOLUTIONS

TO COMBAT TRADE FRAUD, SMUGGLING, & TERRORISM

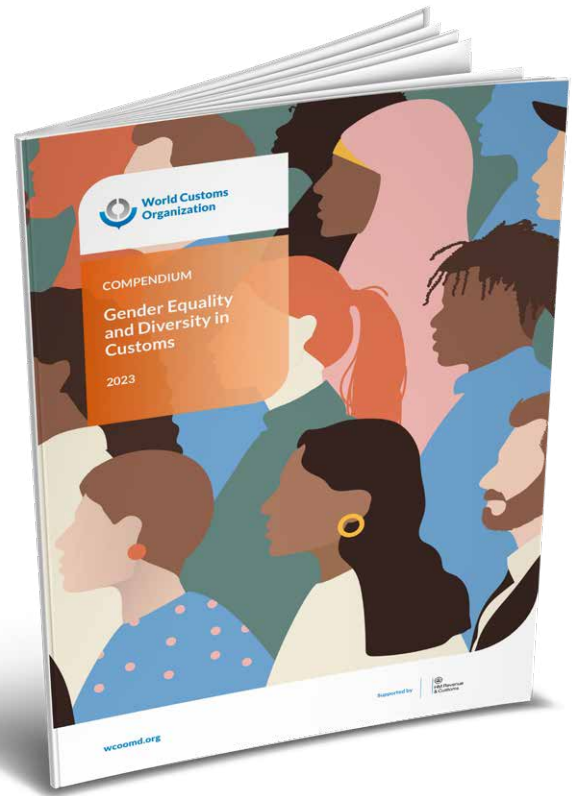
Secure your port of entry and enhance operational efficiencies. Our industry-leading cargo inspection technology helps to uncover threats and contraband while our data integration platform collects and combines information from your operation to automate processes, control workflows, and deliver actionable intelligence. With decades of experience in cargo scanning and solutions, we can define and deliver the ideal screening program for your mission.



**EAGLE**<sup>®</sup>  
[rapiscan-ase.com](http://rapiscan-ase.com)

# Second edition of the Compendium on Gender Equality and Diversity in Customs

Eleven administrations contributed to the second edition of the *Compendium on Gender Equality and Diversity in Customs*. A short overview of their contributions is provided below.



## Argentina Customs

Argentina's Federal Administration of Public Revenues (AFIP) presents Argentina's regulations relating to gender and diversity, as well as the role and activities of its Directorate for the Coordination of Gender and Human Rights Policies, which was created in June 2020. AFIP has developed a Gender and Diversity Programme, among other things. This includes a two-phase training programme that starts with an introductory course on gender and human rights, and is followed by a workshop involving reflection on, and in-depth study of, concepts and practices that can lead to violence and discrimination. 75% of AFIP's staff had completed this training by early 2023. Many other measures are mentioned, including paid leave for workers who are in a domestic violence situation to enable them to carry out necessary judicial and/or administrative procedures, the expansion of the choice of gender identities in its human resource system, by adding "trans", for example, and the development of communication campaigns.

## Canada Border Services Agency (CBSA)

CBSA shares some of the insights gained from its annual employee surveys, listening tours, consultation and engagement sessions, and formal reporting activities. It explains, for example, that, while the Listening Tour revealed that 81% of employees surveyed said they felt pride working for the CBSA, the Tour also revealed that this source of pride stemmed from an individual's disposition towards the type of work they did, rather than the environment itself. The Tour also identified the CBSA's need to better tell its

story to the public and the media, especially as it faced increased criticism of its Customs and immigration handlings. CBSA also explains the mandate and activities of its many committees and bodies working on gender and diversity issues. It highlights a number of initiatives related to recruitment, including the launch of a targeted hiring process that is focused on improving diversity as well as a recruitment campaign specifically geared at women.

## German Customs

In Germany, as required by law, the Central Customs Authority and its 41 main Customs offices and 8 Customs investigation offices each have their own Gender Equality Plan, based on a common internal framework; each office can also include additional topics that may be relevant to their local contexts. In line with Germany's national law, again, German Customs has appointed Gender Equality Officers (GEO) in each office. By law, only women can vote for and become the GEO. The GEO is elected for a four-year term and is tasked with monitoring the implementation, execution and evaluation of measures and regulations, as well as advising the administration. Noting that women often lack the confidence to apply for certain positions and tend to struggle with work-life balance, the administration has also adopted an internal decree on the professional advancement of women. Several measures are mentioned. For example, if female employees are under-represented in a particular staff category, they are given preferential treatment in the career development process. The administration also assists employees with family or caring responsibilities to take part

in training. For instance, the costs of childcare or other care responsibilities during the training period can be partially reimbursed.

### **Indonesia Customs**

Indonesia Customs takes part in the gender mainstreaming competition which has been held annually since 2015 by the Ministry of Finance and is open to all its departments and regional offices. The process includes a pre-selection stage, during which units participating in the competition are required to submit a summary of relevant policies and activities in specific areas. This is followed by an on-site assessment of the unit's infrastructure. The Juanda Customs and Excise Office was selected as the 2022 competition winner to represent the Customs administration with its Migrant Partner Programme, a Consultation and Service Centre targeting Indonesian Migrant Workers which aims at supporting Indonesian migrant workers, many of whom are women, to access and complete the required Customs procedures when they return to Indonesia.

### **Revenue - Irish Tax and Customs Administration**

Revenue (the Irish Tax and Customs Administration) explains in detail how it addresses data gathering, establishes dialogue and engages staff, and uses a blended learning model to deliver training to build the knowledge, skills and attitudes needed to eliminate discrimination, promote equality and protect human rights.

### **Mauritius Revenue Authority (MRA)**

MRA approved an Equal Opportunities Policy in August 2018 and presents some of the measures taken to minimize the risk of discrimination against employees and promote recruitment, training, selection and employment on the basis of merit. In recent years, MRA has recruited an increasing number of female candidates, especially in its Customs unit, which was previously a male-dominated arena.

### **Peru Customs**

SUNAT (the National Superintendency of Customs and Tax Administration) conducted a survey which showed that a large number of employees did not know what behaviours could be considered to be sexual harassment at work, or how to report such behaviours. SUNAT developed an e-learning course on this topic and made it mandatory for all staff. The training commenced in March 2022.

As of June 2022, more than 2,500 members of staff had completed the course.

### **The South African Revenue Service (SARS)**

SARS introduces several programmes it has established, including the Women in Leadership (WiL) programme and the SARS Junior Board. Among other things, the latter is mandated to provide insights and inputs so as to enrich SARS policies and accelerate positive and meaningful change, and to challenge conventional thinking and be the provocateurs of a different way of leading. SARS also presents actions taken to prevent gender-based violence and sexual harassment, encourage employees to speak up against any incidents, and provide support to victims. SARS is also working to ensure it includes persons with disabilities among its staff and responds to the needs of traders and taxpayers with disabilities. It has established a dedicated Unit to work on these issues, conducted a survey to identify needs, and sourced software, and provides services such as sign language interpretation to enable persons with disabilities to work for and be serviced by SARS, among other things.

### **Ukraine Customs**

To coordinate the numerous initiatives related to the implementation of gender policy, Ukraine Customs established a Working Group on Gender Policy Implementation. Its first task was to analyse the degree to which the Customs authority was ensuring the principles of gender equality. To do this, members of the group followed training, conducted an anonymous survey among employees, and examined strategic documents, programmes and policies. Staff from Ukraine Customs also joined the WCO Virtual Group on Gender Equality and Diversity in January 2022 and WCO material such as the *WCO Gender Equality Organizational Assessment Tool (GEOAT)* has been translated into Ukrainian. Training is another key element of the administration's GED policy, and it has developed an online training course on GED.

### **Zambia Revenue Authority (ZRA)**

In March 2020, the ZRA established its Women Leadership and Development Forum (WLDF) with the overall goal of ensuring that 50% of leadership positions at Director level and beyond were held by women by the year 2025. One of its first tasks was to develop a questionnaire to understand how female officers perceive the workplace

---

*The Secretariat hopes that the experience and initiatives that it showcases will inspire other Customs administrations to take further action to become more gender responsive and inclusive.*

---

and the challenges they face, as well as which measures are needed to support the development of their careers. One of the challenges highlighted by ZRA is how to make women realize their value and the career opportunities offered to them. ZRA also explains how it works with the WCO Secretariat to use the WCO GEOAT and to upskill its staff through training.

### The Zimbabwe Revenue Authority (ZIMRA)

ZIMRA launched the Women in Taxation (WiT) forum in March 2022. Composed of 100 women from all ZIMRA offices, this forum aims to provide a platform for women employees to discuss issues that affect them in the workplace. The challenges identified include working at border posts that are usually far away from family, staff transfers and maternity issues. As a result of discussions, ZIMRA is hoping to conduct some policy reviews to further implement gender-responsive measures. The policies that are under discussion include the development of a “transfer of nursing women”

policy and a policy to prevent sexual harassment. WiT also plans to reach out to businesswomen to improve their knowledge of Customs and taxation policies and processes.

This second edition of the *Compendium on Gender Equality and Diversity in Customs* was funded by the United Kingdom’s HM Customs & Revenue (HMRC) under the framework of the WCO/HMRC Accelerate Trade Facilitation Programme. The Secretariat hopes that the experience and initiatives that it showcases will inspire other Customs administrations to take further action to become more gender responsive and inclusive. It also would like to encourage those administrations who have not done so yet to participate in the next edition of the Compendium.

#### More information

<https://www.wcoomd.org/en/topics/capacity-building/activities-and-programmes/gender-equality.aspx>



Knowledge Beyond Borders

“At the Centre for Customs and Excise Studies I received **high-quality** tuition from **professionals** who understand the industry, which gave me the knowledge, **skills and confidence** to further my career.”

**SHERRIKA SHALLOW-JOHN**

Senior Customs Officer  
Saint Vincent and the Grenadines



## BACHELOR OF BORDER MANAGEMENT

CHARLES STURT UNIVERSITY IS AN AUSTRALIAN UNIVERSITY,  
TEQSA PROVIDER IDENTIFICATION: PRV12018. CRICOS PROVIDER: 00005F.  
CUSTOMSCENTRE.COM / CUSTOMS@CSU.EDU.AU



# CLiKC! - new courses and new design

New e-learning modules are available to Customs officers via CLiKC!, the WCO learning platform. Since April 2023, the platform also features a brand-new design that is both modern and intuitive, as well as an improved search function which allows users to quickly find the content they need. Last but not least, users can now download the CLiKC! mobile application and learn anywhere at any time on their phone, whether they are connected to the internet or not. Twenty-five mobile-optimized courses and videos from the CLiKC! catalogue are already available on the app, with more coming in the coming months.

The latest courses are:

- Internal Affairs **New** (English, French, Spanish, Portuguese, and Arabic)
- Authorized Economic Operator (AEO) Validation **New** (English, French)
- Role of Customs in Disaster Relief **New** (English, French)
- WCO course on simulation exercises in enhancing Customs' operational readiness to respond to disruptive events **New** (English, French)
- Data Analytics – Advanced on Fraud Detection & HS Recommendations **New** (English, French)
- Combatting illicit medicines and counterfeit substandard medical supplies **New** (English, French)
- Harmonized System Advanced **Updated** (English, French)
- Customs Valuation **Updated** (English)
- WCO Data Model – An introduction **Updated** and Advanced **Updated** (English)
- Introduction to the WCO Data Model and the Single Window - Video Lecture **New** (English)

## More information

<https://cli kc.wcoomd.org>  
[el e arning@wcoomd.org](mailto:el e arning@wcoomd.org)



## WCO Academy - the private sector's point of access to WCO expertise

The WCO Academy was launched in May 2018 to provide representatives from the private sector and academia with access to WCO distance learning courses. The aim is to disseminate knowledge related to WCO standards, tools and instruments to a wide audience, thereby supporting their worldwide implementation. Some 15 Customs- and trade-related topics are covered, amounting to over 100 hours of content. The courses are split into modules and are mainly available in English and French.

In 2022, the WCO Academy platform was redesigned and the purchasing options modified.

Learners can now choose between:

- taking a standalone module - this is the ideal option for those who only want to access specific content and who do not wish to complete a full course;
- taking a full course and being awarded a certificate after completing all the modules and passing the final exam; or
- taking out a subscription to the entire course catalogue (no certificates are awarded under this option).

## More information

<https://academy.wcoomd.org>

# Dossier: Fragile Borders



# Enabling Customs in Fragile and Conflict-Affected Situations

By Kunio Mikuriya, Secretary General, World Customs Organization

Fragile borders are areas where State agencies, particularly Customs, are unable to operate properly owing to the insecurity created by armed groups. Although each fragile and conflict-affected situation (FCS) has its own specificities, similarities do exist across countries in terms of the role of trade as an economic resource for communities, the embeddedness of smuggling in social activities, and the informal taxation levied on traders and cross-border flows of commodities by non-State armed groups such as terrorists, criminal gangs or guerrillas.

Although the presence of Customs in such areas poses challenges, it is crucial and should be supported by Governments with a view to ensuring a State presence that is not purely coercive but also fulfils an economic mission. Customs administrations operate as an interface between border security and the border economy. In addition to its efforts to prevent the illicit trafficking of prohibited and restricted commodities that may serve the purposes of armed groups (such as weapons, explosives and their precursors), Customs also ensures the deployment of economic missions that are critical in fragile borderlands. Customs can facilitate cross-border trade, implement fair revenue collection and adapt its anti-smuggling policies to take account of local conditions and needs. Through locally-tailored measures based on its deep knowledge of the area, Customs can ensure equal access to economic opportunities for all, preventing rent-seeking behaviours and the concentration of trade by a local elite, which often leads to local grievances. Last but not least, Customs can shed light on certain ongoing dynamics which often remain poorly understood and inadequately integrated into policy-making.

## From research to an Action Plan

To support Customs administrations which are confronted with FCS, the WCO Secretariat started working with some administrations to analyse the role they play in the security architecture, the strategies they have deployed

to meet challenges, the tools and equipment they use, and the relationships they have established with security forces. In 2016 it initiated field research in more than 14 countries, and in 2022 it published *Customs, Security and Fragility: Practices and Recommendations from the North Africa, Near and Middle East Region*. The Secretariat has also issued a *Note on the role of Customs in fragile and conflict-affected situations*, which highlights the specific issues encountered in fragile situations and offers several recommendations for tackling them.

Among the key recommendations presented in the Note are:

- assess the financial and security requirements for defending Customs infrastructure from terrorist attacks and/or repairing any damage caused by conflict;
- take account of the specific needs of border areas which may not necessarily be part of major trade routes;
- ensure a fair trading system which is accessible to all;
- make sure that humanitarian aid can cross borders smoothly and efficiently;
- allow Customs to play a key role in security by ensuring that they have the necessary enforcement powers;
- make sure that capacity building plans are based on a country's own needs and demands rather than being driven by a donor agenda, as ownership is a key component of any successful capacity building effort.

When this edition of the magazine goes to print in June 2023, WCO Members will be about to discuss an Action Plan on Fragile Borders that should guide the WCO's activities in this area from 2023 to 2026. The Action Plan focuses on



five major domains, each with its own objective, namely:

- Research, the objective being to continue to develop knowledge about the role of Customs in FCS;
- Global advocacy and communication, where the objective is to enhance the understanding of governments, other security forces, stakeholders, partners and donors about the role of Customs in FCS;
- Institutional arrangements and inter-agency cooperation, the objective being to strengthen Customs' visibility and participation in national security policies;
- Security of personnel and infrastructure, the objective being to strengthen the capacities of Customs to choose appropriate equipment and secure infrastructure;
- Mobilization of Customs data and intelligence, with the objective of enabling Customs to acquire analytical capacity.

### **Content of this Dossier**

For this edition of the magazine, we asked several administrations to present the challenges they are facing and the strategies they have adopted when under threat from terrorist groups, criminal gangs and guerrillas. We have also highlighted some initiatives and good practices.

We start with Cameroon Customs and the experiences of surveillance units based in Cameroon's South-West Region, where separatist groups have been confronting Cameroon's defence and security forces since 2016. The tactics and operational adjustments adopted by the surveillance units to complete the various missions assigned to them by the public authorities are of great interest.

Our second article takes us to Haiti, where armed groups are responsible for an almost permanent climate of terror. The Customs administration explains the impact of the country's extremely fragile situation on its functioning, and sets out some possible approaches to this problem. One very interesting point is that even though the volume of trade has declined, the revenue collected by Customs in Haiti has increased significantly in recent months; this is because

the problems encountered by certain Customs offices have led many importers to switch to other Customs offices, where inspection activities have been expanded accordingly.

Next, we have two articles focusing on institutional arrangements and inter-agency cooperation schemes. The first, by Argentina Customs, explains the collaboration framework which is in place with the National Gendarmerie, the Argentine Naval Prefecture, the Airport Security Police and the Federal Police, as well as measures taken to strengthen ties and build trust between the agencies concerned. The second article, by the United Nations Office of Counter-Terrorism, presents the concept of the Fusion Centre, whereby national partners come together in a collaborative effort to share resources, expertise and information in order to maximize their ability to detect, prevent and respond to terrorist and criminal activity.

An article by the French and Nigerian Customs Administrations then looks more specifically at training, and presents the Borders Academy which is being built in Niger to train the internal security services of West African countries that have experienced a deterioration in security in their border areas. At the Academy, these services will acquire a core body of knowledge and learn common techniques to ensure their interoperability and their ability to counter

violent extremism without hindering economic development.

The final article in the Dossier looks at the constraints faced by humanitarian organizations – which are among the actors operating in fragile and conflict-affected situations – and at how Customs administrations can better support their work.

This is not the first time we have addressed the issue of fragile borders in the magazine, and some aspects of this topic have been covered in articles published in previous editions, which I invite you to consult.<sup>1</sup> The use of satellite imagery and earth observation tools for analysing border dynamics is especially interesting. The WCO Secretariat encourages Customs to examine the use of geodata for more effective border management<sup>2</sup> and we published an article<sup>3</sup> in 2022 explaining how Niger Customs recently financed a study into the use of satellite imagery to reorganize operational services and monitor activities in areas which are difficult to access.

I would like to end by offering my sincere thanks to the contributors to this Dossier, and indeed to all the other contributors to the magazine. I trust that you will enjoy reading their insightful articles.

#### **More information**

[Communication@wcoomd.org](mailto:Communication@wcoomd.org)

---

*When this edition of the magazine goes to print in June 2023, WCO Members will be about to discuss an Action Plan on Fragile Borders that should guide the WCO's activities in this area from 2023 to 2026.*

---

---

<sup>1</sup> See <https://mag.wcoomd.org/magazine-tags/fragile-borders/>

<sup>2</sup> See <https://mag.wcoomd.org/magazine/wco-news-89/potential-uses-of-geodata-for-border-management>

<sup>3</sup> See <https://mag.wcoomd.org/magazine/wco-news-97-issue-1-2022/geospatial-data-niger-customs>



## Working against a security crisis backdrop: the experience of units in South-West Cameroon

By Serge Martin Tepiele, Head of the Kumba trade subdivision at Cameroon Customs

The security crisis gripping a number of regions in Cameroon has severely disrupted the day-to-day operations of the local Customs surveillance units. Whether seeking to nurture a survival instinct, protect the physical integrity of staff or forge ahead with surveillance missions, these units struggle to find the appropriate balance. However, these surveillance units have learned over time to develop tricks and tactics, and make the operational adjustments needed to complete the various missions allocated to them by the public authorities. This article looks at the experience of the surveillance units based in Cameroon's South-West Region.

The WCO refers to fragile borders primarily in three types of situation: where a country faces a security risk due to its proximity to countries that are in a security crisis or post-conflict situation; where a country faces the continued or sporadic presence of armed groups, State or non-State, in one or more of its border areas, and where a country is in a post-conflict situation, and a national crisis has occurred which has led to the weakening of the State and therefore of Customs throughout the country. In all of those situations, the fragile border refers to border areas where conflicts and violent incidents generate a context of insecurity affecting the border economy. More generally, the authority of the State is contested in these areas. States and armed groups compete over fiscal, economic and political power to organize the movement of people and goods.<sup>1</sup>

For almost an entire decade, a number of fragile situations have been observed in Cameroon. Since 2014, the armed terrorist group “Jama’atu Ahlul Sunna Lidda’awati Wal Jihad” (Group of the People of Sunnah for Dawa and Jihad), also known as Boko Haram, has held sway in the country’s North Region. Along the eastern border, there is a degree of insecurity due to the proximity to the Central African Republic, which has been affected by internal instability. Furthermore, in the English-speaking South-West and North-West Regions of the country, separatist groups have continued to rise up against Cameroon’s defence and security forces since 2016.

In view of the scale of the crisis and the significant number of civilian and military victims recorded to date, it is clearly difficult for an officer of the State deployed in these areas to work without threat or fear of harm. The danger is particularly acute for officials working in Customs – a paramilitary corps in Cameroon – and especially for those officers serving in the “active” section of Customs and who are primarily responsible for surveillance, whose operations cover enforcement as well as tackling smuggling and other illicit trafficking. Such duties require a permanent presence and the completion of appropriate checks within the Customs remit, with a special surveillance zone set up along the length of the land and maritime borders, extending up to 12 nautical miles outside territorial waters and up to 60 kilometres, as the crow flies, beyond the land borders (Articles 80

and 81 of the Customs Code of the Economic and Monetary Community of Central Africa).

### **The South-West Region**

Notwithstanding the conflict in the country’s South-West Region, which has been raging for almost seven years, cross-border trade has continued. Excluding the periods when the border has been closed by the authorities, the movement of goods, including on an illicit basis, has not diminished. In fact, the crisis in the region has led to an upsurge in smuggling and trafficking activity not only by small armed groups but also by all other actors generally who take advantage of the situation, such as merchants, freight forwarders, carriers, guides, private escorts, the military, government officials and locally elected officials. This escalation in illegal activity has been identified in the light of, in particular, the number of alerts sent by units in the crisis zones to those in the secure zones so that the latter can intercept suspect cargo, and the number of seizures conducted in the secure zones directly bordering the crisis zones.

This escalation can be attributed to various causes. Firstly, the surveillance services, for safety reasons, can no longer deploy after nightfall, which is the perfect time for all kinds of smuggling and trafficking activities to take place. Secondly, some units have experienced a reduction in their numbers over the years. Finally, against a backdrop of long-standing tensions between the public authorities and secessionist groups, there is also an unspoken tendency to tolerate smuggling with a view to preserving social order, provided that this activity does not involve sensitive and prohibited goods.

This approach may appear questionable, but it is important to note that it takes only one poorly negotiated seizure to ignite the situation and for tensions subsequently to boil over throughout the entire zone. Customs officers must analyse the situation before taking any enforcement action and assess the impact of their decision-making on social stability. On that basis, in the case of non-prohibited goods and where the existing security situation does not lend itself to taking action, Customs officers will simply notify their superiors, who will then choose the secure zone unit that is the most appropriate unit to take the necessary action.

---

*The danger is particularly acute for officials working in Customs – a paramilitary corps in Cameroon – and especially for those officers serving in the “active” section of Customs and who are primarily responsible for surveillance, whose operations cover enforcement as well as tackling smuggling and other illicit trafficking.*

---

<sup>1</sup> World Customs Organization Secretariat note on the role of Customs in fragile and conflict-affected situations, [www.wcoomd.org](http://www.wcoomd.org).

Account must also be taken of the “fiscal competition”<sup>2</sup> between the State and armed groups which also collect tax on goods. Customs service users often ask for clemency on the ground that they have already paid “Customs duty”. It has been known for some importers along the Ekondo Titi-Kumba corridor to present themselves at Customs with a “passavant” permit issued to them by an armed group as a form of receipt and intended to be shown to any other armed group they might meet along the corridor. In those circumstances, as a rule, the service responds with a degree of flexibility and lectures the user in strong terms about the need henceforth to pay the duty only to the state Customs authorities.

Illicit trade has had repercussions on Customs revenue. However, although revenue dropped at the very start of the crisis, there has been a rather more stabilizing trend over recent years, due in part to the reduction of the internal tax charges<sup>3</sup> benefitting the economic structures of the region – declared an economic disaster area<sup>4</sup> by the public authorities – and thus enabling some businesses to continue their import operations in spite of the prevailing crisis.

### Enhanced cooperation with the defence and security forces

Cooperation between Customs and the other administrations is not a recent phenomenon. It has always been part of Customs’ remit to pledge support to the other administrations in view of its privileged position at the borders. Since the emergence of the various crises at the borders, Customs has stepped up its collaborative efforts with the defence and security forces. The Customs surveillance units operate, for the most part, within patrols and in mixed checkpoints, bringing together officers from Customs, the police and the army or gendarmerie. Such collaboration is in evidence, for example, in Kumba where the three main checkpoints providing access to the town (the Mabanda checkpoint on Mamfé Road, the “Mile One” checkpoint on Mbongue Road and the Mabondi checkpoint on Buea Road) are manned round the clock by mixed police/Customs/gendarmerie teams. A mixed team set-up of this



© Cameroon Customs

nature is also in operation in the towns of Mamfé, Mbongue and Ekondo Titi.

Organizing mixed patrols and checkpoints where fragile borders are concerned presents a number of advantages: firstly, this arrangement facilitates trade insofar as the administrations working together in this context carry out their various checks on the goods concurrently in a single location. Secondly, the mixed patrols and checkpoints are an asset contributing to the safety of those officers serving within them because of the number of officers involved. A traditional Customs checkpoint is operated by three officers on average, whereas a mixed checkpoint or patrol could include as many as 10 officers or even more. Customs officers, as a rule, have received less training and are less well equipped to defend themselves than their police, gendarme and military counterparts. The mixed checkpoints and patrols therefore offer them a degree of security by guaranteeing an increased response capacity in the event of attacks by armed groups.

<sup>2</sup> This term is taken from a World Customs Organization (WCO) Secretariat note on the role of Customs in fragile and conflict-affected situations, which can be consulted on the Organization’s official website at [www.wcoomd.org](http://www.wcoomd.org).

<sup>3</sup> Decree No. 2019/3178/PM of 2 September 2019 to specify the procedures for implementing the status of economic disaster areas and conditions for related tax benefits provided for by the provisions of Articles 121 and 121a of the General Tax Code.

<sup>4</sup> Decree No. 2019/3179/PM of 2 September 2019 to grant the status of economic disaster areas to the Far-North, North-West and South-West Regions.



## **Involvement as part of the Security Operation Command**

Each administrative authority has an Operation Command responsible for security that periodically brings together the main security protagonists to examine the security situation and take the necessary decisions. Although, in the major cities like Douala and Yaoundé, Customs has been all but absent for some time from this command, that has not been the case in the more rural communities and certainly not in the fragile border areas.

In the South-West Region, Customs, which is generally represented by its active branch, has always been involved in the weekly meetings chaired by the prefects. It uses this forum to present the security problems encountered in its activities and establishes close bonds with the other defence and security forces. Although its involvement was, for a long time, no more than a de facto arrangement, the Cameroon authorities soon understood the key role that Customs plays in such an arrangement. On 30 March 2022, the Secretary General of the Presidency of the Republic notified to the Minister for Finance the agreement by the Head of State that Cameroon Customs should be involved as a matter of course in public security meetings held throughout the national territory.

## **Prohibited goods at the heart of surveillance challenges**

In security crisis situations and in armed conflicts at the borders, Customs must, above all, cut off the supply sources for sensitive products, in particular for weapons and munitions, as well as for some chemical products used in the manufacture of explosives. In 2021, Customs officers in the South-West Region accordingly seized a consignment of 850 12-gauge cartridges originating from a neighbouring country and several consignments of targeted chemical products.

Surveillance activities also focus on the illicit trafficking of medicines, some of which are used and placed on the market by armed groups, in particular Tramadol, an analgesic in general use in many countries including Cameroon. In early 2023, Customs officers of the South-West Region seized, for instance, 43 packages containing some 320,000 tablets, injectable vials and ampoules, as well as 7,440 boxes of shisha tobacco.

## **Supporting newly assigned officers**

The towns of Kumba, Mamfé, Ekok, Ekondo Titi and Mundemba are the focus of attention. Once peaceful and thriving, in recent years they have provided a stage for acts of violence. In the town of Kuma alone, between October 2020 and January 2023 a number of deaths were registered, including those of seven students from the *Mother Francisca International Bilingual Academy*, six bus passengers, the head of the Rapid Intervention Battalion and one police inspector.

For any staff used to working in a peaceful environment, being assigned to or appointed in any of those towns is a psychological shock; all the more reason for any newly assigned officers to be reassured and appropriately informed by their superiors and fellow colleagues, so that they can distinguish between rumour and the reality on the ground, and take all relevant measures for their personal safety and potentially that of their families. That level of preparation affords these officers a degree of confidence in believing that they will be able to live and do their job by following the guidance offered by their new colleagues.

In spite of these support measures, officers assigned to these areas sometimes delay in taking up their position and find an alternative opening. Occasionally, following weeks or even months of waiting, their superiors find out, after making contact with the officers concerned, that they have taken up a new posting elsewhere.

As a result, some units have dwindling staff numbers, thus making surveillance missions even more difficult. By way of illustration, the five departments making up the trade subdivision in Kumba have reduced in size from 46 officers in July 2020 to 32 in December 2022, with the departure of 14 staff without any subsequent replacement over the two years.

## **Managing movements: military escort and equipment**

In itself, secondment in the towns located in risk areas is not dangerous. The security threat is most apparent when travelling between urban areas, as separatist groups very often hide along the roads leading into the towns and orchestrate their attacks on the travelling civilian population.

That is why Customs staff are highly encouraged, and indeed urged in the strongest terms, as a

matter of routine, to travel with an armed escort, whether provided by units from the land army, such as a Rapid Intervention Battalion (BIR) unit, which is considered to be very safe on account of its strike force, or the gendarmerie or even the police. Requesting an escort is a relatively straightforward procedure: public servants wishing to travel directly to or via a crisis area must present themselves at the base of one of those units in one of the towns closest to the area concerned and disclose their civil and professional identity. Their request is registered, and they are allocated a seat in an armoured vehicle according to the escorts' schedule. They may also request to travel by their own means of transport; in that case, their vehicle is registered and placed in a convoy among armoured vehicles so as to guarantee their protection throughout the journey.

To date, no Customs officers who have followed this security advice to the letter have had their lives threatened. However, several incidents have arisen on unescorted journeys involving private vehicles or when using public transport. Although none of these incidents have, thankfully, led to the loss of human life, they have resulted in serious physical and psychological injury for the public officials subject to attack. In November 2020, various heads of the mobile Customs unit who were travelling to a town in a private vehicle to perform a handover of duties were abducted, driven into the bush, stripped, threatened and assaulted before being released several hours later. In April 2021, one Customs officer from a mobile unit who was travelling to a Customs checkpoint was targeted by armed attackers and shot in the arm. In May 2021, a Customs inspector travelling in a private vehicle was targeted by armed attackers who opened fire on him after stopping his vehicle. He escaped with serious injuries and spent several months in hospital.

Officers will also need to have security equipment to hand when travelling. In order to travel by armoured convoy to their assigned area for surveillance operations and during some field operations, they must be equipped with a bullet-proof vest, a heavy helmet, a tear gas canister and an automatic pistol. At all other times, they are advised to blend anonymously into the background and to carry only equipment which cannot identify the carrier as belonging to a sovereign body. A bullet-proof vest would be inappropriate attire for moving around in public



© Cameroon Customs

locations, although an automatic pistol or a tear gas canister by contrast can always be concealed about the waist.

### Operational tactics

Armed groups see all agents of the State as their enemy. Although ordinary civilian passengers are often released, usually after being stripped of their possessions, those passengers identified as state representatives are either executed or kept as hostages in return for a hefty ransom.

Officers unable to travel with an escort are therefore advised, when travelling to and from an area under their surveillance – for instance, to visit families outside their work location – not to wear their uniform. Furthermore, once they are assigned to a conflict zone, and acting on the advice of more senior colleagues, some officers obtain a new identity document stating another profession unrelated to their true work (e.g. driver, gardener, cook). Some even arrange for a certificate to be drawn up attesting to their having lost their identity card, the benefit of which being that it makes no reference to any profession.

Camouflage is also a must during checking operations. As prime targets for armed groups, Customs officers mostly carry out their duties in civilian clothing, both when conducting roadside checks and during patrols alongside the other defence and security forces. In order to prove their status during the checks, they present their official service document, which serves as a professional identity card for Customs officials.

As explained above, those units located in unsafe areas do not always take action if the odds of their maintaining control of the situation are stacked against them. They will turn a blind eye to some fraudsters while compiling useful information

---

*Units located in unsafe areas will turn a blind eye to some fraudsters while compiling useful information on them and will alert the units located downstream in a safer geographical sector. Many fraudulent consignments are intercepted in that manner following an alert issued by the surveillance units in the crisis areas.*

---

on them (for example: registration number of a suspect lorry, make, colour, container number, time of transit, description, etc.) and will alert the units located downstream in a safer geographical sector. Many fraudulent consignments are intercepted in that manner following an alert issued by the surveillance units in the crisis areas.

### Arrangements in the field

Arrangements in the field essentially involve the practical reconfiguration of the units that invariably operate at least in pairs. Thus, in the geographical sectors where the overseeing units, comprising a reduced number of staff, have been regrouped within the same town, the heads of the units in general work together to merge the staff into a single entity and issue joint service orders. This practice has at least three major advantages: preventing multiple checks on operators in respect of the same goods and in virtually the same location, having larger units which can deploy more effectively on the ground and

having a greater capacity to defend themselves if subjected to an attack in the field.

Kumba is a perfect example of this practice. In this remote town served by a mobile unit of two officers, a trade unit of three officers and a sub-office with no attached officer, it has proven inefficient, if not completely unfeasible, for these units to operate separately given their low staff numbers, the scarcity of trade flows to be checked and especially the fragility of the security situation. The adjustments made by the unit heads and the formation of a joint squad facilitate effective deployment across the different operational sites. That practice is applied successfully in other locations, sometimes with the support of the other state administrations.

### More information

[douanes-cam@minfi.gov.cm](mailto:douanes-cam@minfi.gov.cm)

[cab.douanes.cameroun@gmail.com](mailto:cab.douanes.cameroun@gmail.com)

## A unique hybrid Executive Master for leaders in customs and international trade

The Rotterdam School of Management Part-Time **Executive Master in Customs and Supply Chain Compliance** accelerates your understanding of all of the critical issues and key players in customs regulations, supply chain management, information technology & compliance. The programme has been developed in conjunction with the World Customs Organization and input from a number of world-leading, international institutions.

[rsm.nl/customs](https://rsm.nl/customs)



Learn more  
about our Part-Time  
Executive Master in

**Customs and  
Supply Chain  
Compliance**



# The security crisis in Haiti and its impact on Customs

By the General Customs Administration of Haiti

In Haiti, the political instability that followed the departure of President Jean-Claude Duvalier in 1986 was compounded by a security crisis caused by the military coup against President Jean-Bertrand Aristide in 1991. This culminated in the assassination of President Jovenel Moïse in 2021 and led to the emergence of armed groups, which are now responsible for an almost permanent climate of terror. This article will explain the impact of this extremely fragile situation on the functioning of the Customs Administration and set out some possible lines of approach.

## The General Customs Administration of Haiti

The General Customs Administration of Haiti (*Administration Générale des Douanes d'Haiti* – AGD) is a decentralized technical service within the Ministry of the Economy and Finance. It is led by a Director General who is assisted by a Deputy Director General.<sup>1</sup> Its role is to oversee the movement of goods in order to collect revenue, create a trading environment favourable to economic development, and protect the country from threats linked to or generated by international trade.

In 2012, the AGD had 1,353 employees, of whom 971 were men and 382 women.<sup>2</sup> In May 2023, it had 2,256 employees, of whom 1,592 were men and 664 women.<sup>3</sup> The land border between Haiti and the Dominican Republic is 360 km long, and the sea border extends along the 1,771 km of coastline.

In terms of its organizational structure, the AGD has a general management and technical and administrative departments. It also has 17 field Customs offices responsible for Customs clearance operations and formalities, 12 of which are based in ports and airports and four along the land border. The AGD also has nine

on-site Customs offices in special Customs areas commonly referred to as industrial parks or free zones.

In addition, six road checkpoints monitor the movement of goods, people and means of transport in order to combat fraud and trafficking.

In the period from October 2022 to April 2023, the AGD dealt with 35,171 containers of goods, representing a weight of 1,880,513 tonnes.<sup>4</sup> As part of its tax role, it collects Customs duties and import taxes on goods, although export duties have been abolished. On behalf of the Treasury, it collects around 8 billion gourdes per month (over 50 million US dollars<sup>5</sup>), i.e. 56% of the taxes and duties collected by the State.

Table 1 – Collection of tax and Customs revenue

Agency	Total from October 2022 to 30 April 2023	
	%	Revenue in billions of gourdes
Directorate General for Taxation	44%	43.026
General Customs Administration	56%	54.244
Other administrations	0%	0.042
TOTAL	100%	97.312

Source: Bank of the Republic of Haiti

1 Customs Code 1987, Article 301.

2 Source: AGD "Rapport sur le personnel" [Staff Report], Human Resource Department.

3 Source: AGD "Rapport sur le personnel" [Staff Report], Human Resource Department.

4 Source: AGD, Information Technologies Department.

5 Exchange rate of 156 gourdes to 1 US dollar.




---

*The security role played by the Customs service has significantly increased. Customs officials must systematically inspect imported goods, in particular to prevent gangs from being supplied with weapons and ammunition.*

---

### **An increased security role**

With the rise in organized crime, the security role played by the Customs service has significantly increased. Customs officials must systematically inspect imported goods, in particular to prevent gangs from being supplied with weapons and ammunition. Some economic operators conceal illegal products in legitimate cargoes, and criminal networks sometimes operate under the guise of institutions benefitting from exemptions. In July 2022, for example, 17 assault rifles and ammunition were discovered in the port of Port-au-Prince in an import destined for a religious institution. During the same month, the Customs office in Port-de-Paix has seized 14 firearms and 434 items of ammunition. In July 2022 alone, police and Customs carried out five operations during which weapons and ammunition were confiscated. The importers, as well as others involved in the fraud, were arrested and brought before the courts.

### **The current crisis and the violent criminals involved**

Every State is responsible for ensuring the security and well-being of its citizens. Unfortunately, in Haiti, the organization of elections and the taking and exercise of power do not always occur under transparent and lawful conditions. Since 2005, in the run-up to elections, certain politicians have distributed weapons among their supporters to

prevent their opponents from fulfilling their civic duty on election day. Once the elections are over, the weapons are not retrieved by the police.

Consequently, many people are now in illegal possession of weapons. According to the online newspaper *Ayibopost*, “some 500,000 illegal firearms are in circulation in the country”. Armed groups have been formed, some of which have turned into gangs responsible for kidnappings, rapes and ransom demands. They also organize all kinds of racketeering and hijack lorries carrying imported goods. Some groups are also used by businessmen to provide security for goods convoys. The situation has become so serious that, at the request of the UN,<sup>6</sup> countries such as the United States, Canada and the Dominican Republic have adopted sanctions against politicians and businessmen who allegedly have links with the gangs.

At least five gangs have set up along the coastline of Port-au-Prince Bay where the port, its terminals, the Customs office, warehouses, Customs clearance areas and gas stores are located. Two more control the road leading to the Malpasse border Customs office, which is situated on the border between the Republic of Haiti and the Dominican Republic, 50.4 km from Haiti’s capital.

<sup>6</sup> Resolution 2653 adopted by the UN Security Council on 21 October 2022.



## Abductions

The current security situation in Haiti is also having an impact on the working conditions of the AGD and its officials. According to a press release by the UN High Commissioner for Human Rights, “[t]his [violence] follows the killing of at least 846 people in the first three months of 2023, in addition to 393 injured and 395 kidnapped during that period – a 28% increase in violence on the previous quarter”.<sup>7</sup> Customs officials are also being targeted, as, “in the space of two months, armed bandits have abducted around 15 Customs employees in Port-au-Prince”.<sup>8</sup>

## Adaptation

When the gangs took control of the port area of Port-au-Prince, the AGD transferred all its staff to the Customs office at the airport. Shortly after this, gang members stormed the building housing the port office and stole everything. Although this looting represents a huge loss, some equipment had fortunately already been moved to the Customs office at the airport.

While this security crisis persists, the Haitian Customs service has taken various other steps in order to adapt, including:

- remote working for those using the automated Customs system who cannot return to their workplace; and

- physical checks at operators' homes when they can provide armoured vehicles for the transport of officials.

## A psychological impact that cannot be ignored

It is difficult to imagine the emotional burden that Customs officials are bearing. Those working at the port have lost their office and been forced to achieve the impossible in limited space. They are also having to go to the port in armoured vehicles. According to Alis David et al., this kind of situation results in “inconvenience, hardship and discomfort, which can become, more or less directly, risk factors for work-related accidents or occupational diseases”.<sup>9</sup> In Haiti, the crisis is affecting the work capacity of Customs officials. At least five cases of emotional problems have been logged by the AGD's Human Resources Department.

## Slower operations

The Customs officials affected at the port are having to make numerous return journeys between the terminals and their new office at the airport. The fact that they are no longer constantly on site is considerably slowing down Customs clearance operations, even though the volume of trade has reduced.

7 <https://www.orientlejour.com/article/1336887/violences-plus-de-600-personnes-tuees-pour-le-seul-mois-d'avril.html>

8 <https://lefacteurhaiti.com/haiti-kidnapping-dau-moins-15-employes-de-la-douane-en-lespace-de-2-mois/>

9 Alis David et al., “GRH Une approche internationale”, Brussels, Groupe De Boeck s.a., 2011, p. 649.

## Smaller impact on revenue

As paradoxical as this may seem, revenue in recent months has significantly increased. According to the AGD's Research and Statistics Department, when the Customs service passed the symbolic threshold of 8 billion gourdes (55 million US dollars) in February 2023, it marked a record performance in terms of revenue collection. The total revenue is 91.2% higher than in February 2022 and has therefore virtually doubled.

The explanation lies in the fact that the problems encountered by Customs offices such as those in Port-au-Prince and Malpasse have led many importers to use other Customs offices. Trade flows through ports other than those in Port-au-Prince Bay have therefore significantly increased. Inspection activities at those ports have been expanded, resulting in notable cases which, in the period between October 2022 and February 2023, led to additional revenue.

Four key measures should be mentioned:

- creation of a strategic Customs valuation committee responsible for supporting the teams fighting commercial fraud;
- creation of a team of inspectors of the Customs value of goods;
- recruitment of new managers for the inspection department; and
- communications on the ethics code to remind officials of the rules of good behaviour and to combat corruption.

## Other lines of approach

Several other measures are planned to help respond to the crisis.

### **Strengthening the Customs Supervision Department**

The Supervision Department checks that international trade operations comply with the Customs legislation, monitors the borders and ensures the security of Customs staff and buildings. It consists of several mobile units.

The AGD is studying the possibility of increasing the number of units and providing them with weapons and other equipment (drones, monocular telescopes and non-intrusive inspection equipment).

### **A new Customs Code**

A new Customs Code was published by decree in the Official Journal *Le Moniteur*, in its special edition of 21 March 2023. This will help to modernize the Customs service and implement a range of improvements for economic operators.

### **Cooperation**

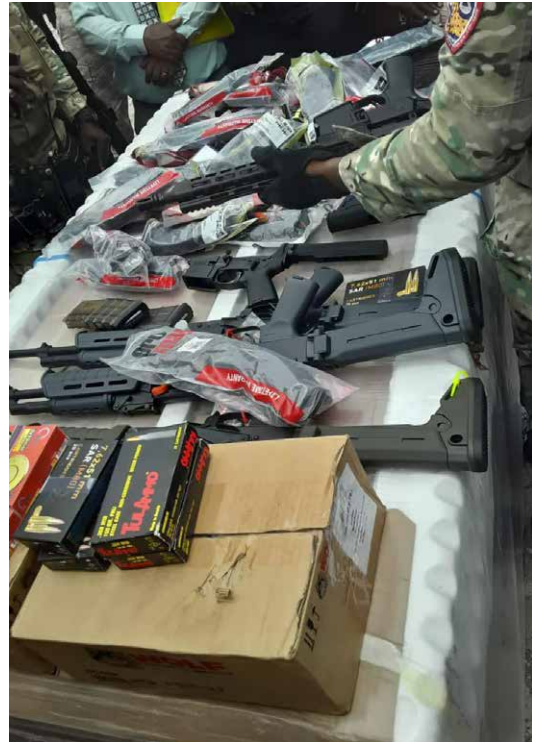
To improve the targeting of inspections, it is vital to facilitate the exchange of information and technical assistance between Customs services in neighbouring countries. Agreements in this respect may be concluded between the Haitian Customs service and other Customs services in the Caribbean Community (CARICOM), which is the intergovernmental organization that brings together 15 States in the Caribbean. It should be noted that agreements have already been signed with the Dominican Republic. One of these concerns strengthening Customs cooperation, in particular by connecting the computer systems of the two Customs administrations.

### **Conclusion**

Although they are continuing to carry out their work, Haitian Customs officials are facing ever increasing risks on a daily basis. The AGD hopes that the Government will soon find a solution to the current crisis, which will allow it to resume its normal operations and continue modernizing.

### **More information**

<https://www.douane.gouv.ht>



# Inter-agency cooperation - the case of Argentina

By Mauricio Víctor Jáuregui, Head of Drug Trafficking Investigations Division 3, Drug Trafficking Department, General Directorate of Customs, Argentine Republic

In Argentina, the Customs, the National Gendarmerie, the Argentine Naval Prefecture, the Airport Security Police and the Federal Police are all responsible for protecting the country's territory. Cooperating with these agencies is crucial for Customs in remote territories where security is a major issue. This article explains the collaboration framework which is in place, as well as measures taken to strengthen ties and build trust between those bodies.

## Cross-border areas are poles of attraction for unlawful activities

Before joining Argentina's General Directorate of Customs (Dirección General de Aduanas (DGA)), I worked in different sectors related to international trade, and had a good knowledge of the working practices of the wide variety of actors involved in import and export operations (shipping companies, brokerage, trading companies, and private and public bodies). This was extremely valuable, as my new job consisted in drafting new legislation to suit the needs of the changing trade environment, as part of the DGA Export Technique Department of the Customs Technical and Legal General Sub-Directorate. However, I soon realized that the legislation was not designed in a way which enabled its effective implementation by the Customs officers dealing with operations, and that it generated ineffective procedures which slowed down the movement of goods. To widen my perspective and acquire the knowledge needed for the legislation to meet the operational, logistic, structural and geographic requirements on the ground, I decided to apply for my transfer to a border area.

Overnight, I went from working at a desk in Buenos Aires to La Quiaca, a small city in the north of Argentina, on the southern bank of the La Quiaca River, opposite the town of Villazón, Bolivia. I started my Customs control duties by checking baggage at the Customs office of the Horacio Guzmán International Bridge, which separates both cities. From there, I could see many individuals carrying bags and bulky items with all kind of merchandise as they crossed the



almost non-existent river to avoid the Customs control area.

To stop them would have required dozens of officers. But with just over 5,000 officers to control 24 airports, 63 Customs offices, 10 free zones and 154 cross-border posts, inadequate human resources is one of the constraints facing the Administration.

### **Fragile borders**

In La Quiaca, like many other border areas, a large percentage of the local population lives off the contraband business. They try to avoid paying duties, excise and other taxes. Some areas of the region have also been taken over by structured criminal organizations that manage intricate logistics networks to move regulated, banned or dangerous merchandise illegally. Taking this reality into account, Customs focuses its control activities on warehouses where goods are stored, and on distribution networks, in order to hit those who orchestrate illegal business.

Three specific regions are difficult and can be considered to be fragile borders as Customs may be confronted with violent armed groups with political or financial motivations.

### **The Triple Border**

The Tri-Border Area (TBA) between Argentina, Paraguay and Brazil comprises three cities: Puerto Iguazu (Argentina), Ciudad del Este (Paraguay), and Foz do Iguacu (Brazil). The border cities rely on revenue from tourism generated by the Iguazu Falls, the largest waterfall system in the world. But they are also known for being major smuggling routes for merchandise such as tobacco, drugs, weapons, endangered species, counterfeit goods, currency and human beings. Most smugglers work on a small scale, but there are also larger criminal enterprises at work.

### **The Mapuche Issue**

The Mapuche are a group of indigenous inhabitants of south-central Chile and south-west Argentina, including parts of Patagonia. They demand jurisdictional autonomy, the recovery of ancestral lands, economic-productive freedom and the recognition of a cultural identity. In recent years, some community members have deployed violence against the Federal Police and seized lands. There are constant clashes between

the Mapuche organizations and the security forces, creating a context of insecurity for the Customs officers stationed at the border posts in the area. Some extremist factions of these organizations are even credited with setting fire to and destroying, among other things, means of transportation and government checkpoints.

### **The Paraná-Paraguay Waterway**

The Paraguay and Paraná Rivers jointly form a 3,400-kilometre waterway system connecting the river ports of Argentina, Brazil, Bolivia, Paraguay and Uruguay. It is a vast region of more than three million square kilometres, whose surface waters flow into the Río de la Plata, and from there into the Atlantic Ocean. Criminal and smuggling activity is complex as it combines different means of transport (water, land and air), making enforcement extraordinarily difficult. According to the International Narcotics Control Board (INCB), the region is a gateway for the transport of cocaine which is manufactured in Bolivia and Peru and destined for international markets. The "Global Report on Cocaine 2023" of the United Nations Office on Drugs and Crime (UNODC) also considers this waterway to be the main channel for the export of drugs to the European consumer market.

### **The challenge of coordinating with security forces**

The specificities of each border checkpoint environment (social, economic, geographic and demographic) should determine how control methods and procedures are applied.

In fragile contexts, the nature and size of illicit trade, the degree of violence associated with it, the evolution of working conditions, the degree of infiltration and corruption of criminal networks, the constraints on enforcement operations, and other specific factors, determine the degree of permeability of our borders.

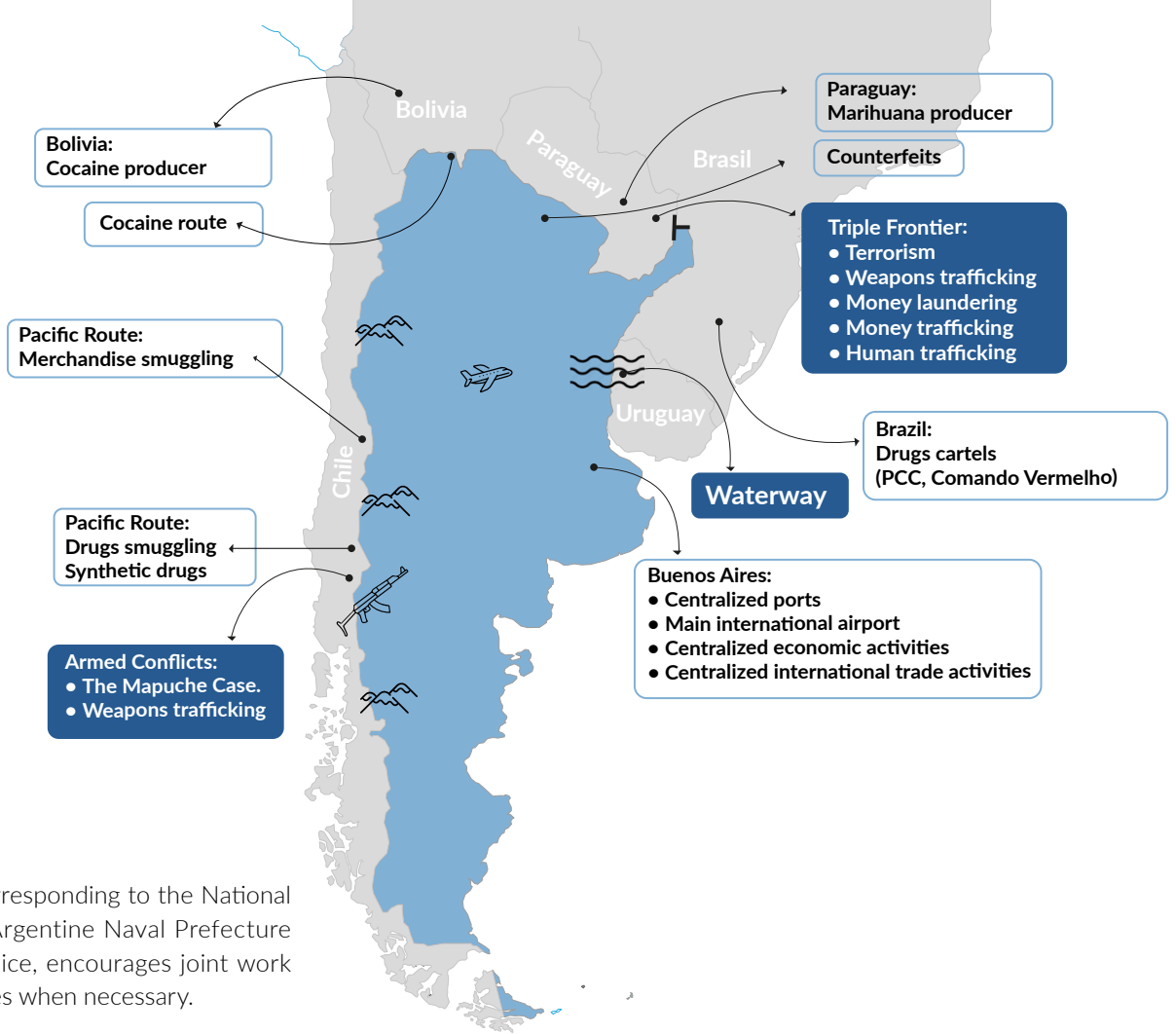
Once threats are identified and needs ascertained, especially when it comes to the equipment and procedures to be put in place to secure staff and operations, Customs must reach out to security forces to ensure actions are coordinated. In Argentina, these are the National Gendarmerie, the Argentine Naval Prefecture, the Airport Security Police and the Federal Police. Law No. 18,711<sup>1</sup>, which stipulates the missions, functions

---

*Once threats are identified and needs ascertained, especially when it comes to the equipment and procedures to be put in place to secure staff and operations, Customs must reach out to security forces to ensure actions are coordinated.*

---

1 <https://www.argentina.gob.ar/normativa/nacional/ley-18711-47243/texto>



and jurisdictions corresponding to the National Gendarmerie, the Argentine Naval Prefecture and the Federal Police, encourages joint work between these forces when necessary.

The Customs Code (Law No. 22,415) divides Argentinian land, water and air territory into many different areas for the application of its control provisions. For the purposes of this article, the most important are:

- The Primary Customs Zone, where special rules apply to the circulation of people and the movement and disposition of merchandise (for example, ports, docks, airports, border crossings and their facilities, warehouses, squares and other places where Customs operations are carried out).
- The Secondary Customs Zone (whatever is not included in the Primary Customs Zone).
- The Special Surveillance Zone, which is the strip of territory of the Secondary Customs Zone located mainly around the land and water borders (rivers, lakes, sea, etc.) and subject to special control provisions.

Law No. 18,711 gives security forces the function of being auxiliaries of the Customs Service in the context of controls, mainly in the Special Surveillance Zone and in the Primary Customs Zones. In the Secondary Customs Zones, sensitive operations such as arrests or raids are to be carried out jointly with them. All agencies

are also to collaborate during investigations and to share intelligence.

Herein lies the main challenge facing our organizations: the application of the procedures, actions and powers granted under the Customs Code, and their coordination with the actions carried out by the aforementioned security forces in their respective jurisdictions. The first step towards meeting this challenge is to recognize the strengths of our organizations, as well as their weaknesses.

**Strengths and weaknesses**

Argentina Customs is part of the Federal Administration of Public Revenues (AFIP), an autonomous body within the Ministry of Economy. Its main strengths lie in the competences conferred on it under the Customs Code (Law No. 22,415).

These include:

- To operate in all land, water and air areas subject to the sovereignty of the Argentine Nation. On the contrary, the four aforementioned security forces must act in their territorial jurisdictions (see Law No. 18,711) and may act outside their

jurisdictions only with authorization from the Executive Power for order and public safety reasons, or at the request of the Federal Justice.

- To exercise its control powers with regard to people and merchandise, as far as they relate to international traffic in merchandise. In this context, Customs officers may, without prejudice to their other functions and powers and without the need for any authorization, detain people and goods with a view to their identification and registration. They may also adopt pertinent measures in order to stop or retain the means of transport; to inspect, interdict and seize merchandise; and to raid and search warehouses, shops, offices, dwellings, residences and addresses, etc. Security forces can control the means of transport, goods and passengers only with Customs authorization.
- To arrest individuals suspected of smuggling, immediately notifying the competent judicial authority and putting the detainees at the latter's disposal within 48 hours.
- To access information on natural and legal persons registered in the country in order to investigate crime and to develop risk profiles. This includes information from the Federal Administration's own records, as well as from the different registries of ownership of movable and immovable property; from credit and financial institutions; from the Central Bank of the Argentine Republic; from the National Directorate of Migration; from the Civil Aviation Administration, and from many other institutions and public and private data centres of interest. Such data is used to initiate, deepen or expand investigations (acting as auxiliaries of Justice); to cross-check information for relationships between suspicious subjects or companies (family, financial, economic, purchases, sales, billing, etc.); to certify information (addresses, ownership, registrations, migratory movements, etc.); to detect abnormal behaviour; and to prepare statistical reports.

The DGA also has good facilities, equipment such as non-intrusive control devices, and highly qualified agents. Finally, it has a small institutional structure and is therefore more agile and less bureaucratic than bigger institutions.

Turning to its weaknesses, for instance, the DGA lacks:

- enough officers in cross-border areas,
- defence capacity (in other words, armed personnel trained in the use of force), and
- access to soft data coming mainly from surveillance and intelligence operations (field research, wiretapping, monitoring, etc.), which are carried out mainly by the federal security forces.

Considering the strengths and weaknesses of each agency is key to coordinating them in pursuit of a common objective and to making the best use of available resources.

### Consolidating ties

Customs and partner agencies are social systems made up of people. Often, officers are unaware of the tasks and duties of their counterparts, have misconceptions about what their counterparts do, or feel that they are in competition and want to claim ownership of results. Building and supporting the strengthening of personal relationships between officers from different agencies is therefore of fundamental importance. Several steps have been taken by Argentina Customs to create ties and foster collaboration with national agencies.

One such example is joint training. The objective is to enable officers from other forces to assist in Customs-related issues, as well as to encourage discussions on ways to meet challenges, to respond to threats, and to exchange information. For instance, at Neuquén Customs, which is located at the border with Chile in Patagonia, we trained the local police officers who patrol the streets and routes on the documentary requirements for Chilean vehicles circulating in Argentina. A couple of days after training was given, the number of illegal and irregular foreign cars discovered increased exponentially.

We also trained officers from the National Gendarmerie, who can exercise controls on cargo trucks on all the routes of the country, in order for them to be able to read international transport documents and identify issues related to international transit operations. This was done mainly in the Mesopotamia region, in the humid and verdant area of northeast Argentina where international trade operations are often used to conceal smuggled goods and drugs. This allows us to have more eyes in the field.

---

*Considering the strengths and weaknesses of each agency is key to coordinating them in pursuit of a common objective and to making the best use of available resources.*

---



It is worth noting that Customs and officers from the security forces spend whole days or weeks working together at some of the 150 remote border crossings in Argentina, and this ultimately turns these checkpoints into small communities. The objective is to create greater synergy and joint commitment in the fight against criminal organizations, as well as to build trust, and to enable officers to easily share information and exchange experiences.

Finally, formal and/or informal daily interactions that strengthen and deepen inter-institutional ties at the management level are encouraged through the organization of social events and official ceremonies (such as anniversaries and commemorations). By encouraging continuous contact between the most senior managers of the organizations, it is expected that mutual synergy will be stimulated or improved.

### **The next step: strengthening inter-agency cooperation at the international level**

Inter-institutional cooperation is a process that Argentina Customs has taken on board

and has been consolidating at a national level. However, the fight against transnational criminal organizations also requires the deepening of inter-agency relationships at the international level. In this regard, the DGA is participating in two WCO projects to promote national and international collaborative work and the active exchange of information: the Colibri Project and the Container Control Programme (the latter being co-managed with the United Nations Office on Drugs and Crime – UNODC).

It is also involved in a project led by Argentina's National Drug Crime Prosecutor's Office (PROCUNAR), which consists in establishing a Joint International Investigation Team between Argentina and Uruguay. Such teams consist of prosecutors and law enforcement authorities and are established for a fixed period necessary to successfully conclude investigations. The project is carried out with the support of the CRIMJUST programme of the United Nations Office on Drugs and Crime.

#### **More information**

[mjvauregui@afip.gob.ar](mailto:mjvauregui@afip.gob.ar)  
[dv-inai3@afip.gob.ar](mailto:dv-inai3@afip.gob.ar)



# Safeguarding Ports & Borders

Leidos safeguards the flow of regulated commerce by facilitating secure, efficient movement of cargo, vehicles, and people, through ports and borders worldwide. Powered by Mezzo™, our AI-based enterprise platform, we provide solutions to effectively detect and mitigate threats.

## VACIS® PORTFOLIO:

- › IP6500 – X-ray Integrated Portal
- › M6500 – X-ray Mobile
- › XPL – X-ray Passenger Vehicle
- › IR6500 – X-ray Integrated Railcar
- › MLX – X-ray Mobile High Energy (early 2023)

## EXPLORANIUM® PORTFOLIO:

- › SRPM-210 – Advanced Radiation Portal Monitor
- › AT-980 – Fixed Radiation Portal Monitor
- › GR-135 – Radiation Handheld Device

[leidos.com/ports-borders](https://leidos.com/ports-borders)

# UNOCT's Fusion Cells Programme – a model for inter-agency cooperation in counter-terrorism

By Nigel Lazarus, Programme Manager and Law Enforcement Advisor, United Nations Office of Counter-Terrorism (UNOCT)

The United Nations Office of Counter-Terrorism (UNOCT) established a Fusion Cells Programme in January 2020 to support United Nations Member States in developing national mechanisms for the exchange and analysis of counter-terrorism related information and the development of strategic and operational intelligence products, such as threat assessments. The Programme has rolled out a delivery model based on international good practice and processes that have proven to be successful in improving national inter-agency coordination.

## The need for inter-agency coordination to counter terrorism

The evolving nature of terrorism and organized crime has reinforced the need to gather, analyse and transform information into intelligence. Today, we all live in a world that is information rich, but countries have yet to develop an effective system for processing and using the vast amount of information that is available to them, which can sometimes hinder vital and strategic decision-making.

There is no doubt that countries have successfully thwarted terrorist attacks, and have substantially improved their air, land, sea, and border security capabilities. Yet these countries are not immune to attacks.

A common finding following terrorist attacks is that pieces of information from different parts of the government could have prevented or frustrated the attack, had they been connected in a timely manner.



Defeating terrorism and organized crime requires an inter-agency coordination mechanism that is adaptable and that can operate actively within all countries to make use of the information and data created daily, including by Customs administrations, which are one of the largest sources of big data for national security.

### **The Global Fusion Cells Programme**

In January 2020, supported by the United Nations Peace and Development Trust Fund (UNPDF) and the Executive Office of the Secretary-General, UNOCT established the Fusion Cells Programme to strengthen “National Interagency Coordination Mechanisms”.

The Programme promotes a “Fusion Centre approach”, whereby national partners come together in a collaborative effort to share resources, expertise and information to maximize their ability to detect, prevent and respond to terrorist and criminal activity. The Programme acknowledges and promotes the role of analysts that are the critical node in such mechanisms.

The United Nations Office of Counter-Terrorism collaborates with the Executive Directorate of the Security Council’s Counter-Terrorism Committee (CTED), which plays an important role in the design and development of the Global Fusion Cells Programme. Its expert assessments and recommendations inform the design of the Programme’s technical assistance and capacity-building efforts.

The Programme responds to Pillar II (preventing and countering terrorism) of the United Nations Counter-Terrorism Strategy and supports Member States in the implementation of Security Council resolutions 1373, 2178, 2322, 2341, 2395, 2396, 2462 and 2482, as well as the 2015 Madrid Guiding Principles on Foreign Terrorist Fighters and its 2018 addendum, among other relevant international instruments and standards.

The Programme promotes the protection of human rights and ensures compliance with the UN Human Rights Due Diligence Policy (HRDDP) by engaging all relevant entities (The Office of the High Commissioner for Human Rights, UN Resident Coordinator Offices, and in-country human rights entities), before conducting desk research, collating, and analysing all available data to create a Risk and Impact Assessment for each beneficiary Member State.

### **Leveraging the Fusion Cell model for Customs agencies and border management**

As countries have different needs, capacities and constraints, the Fusion Centre Model is tailored to the beneficiary’s context and based on international good practice related to the creation and operationalization of such facilities. The Programme focuses on sharing international experiences, processes and training that can be applied wherever there is a need for an inter-agency coordination mechanism, data analysis and decision-making. In fact, the approach can apply to various security issues, such as crisis or emergency response, natural disasters, or to the mitigation of organized crime, amongst others. As Customs agencies produce vast volumes of data, they are likely to benefit from this approach at local, regional or national levels.

### **Programme modules**

The Programme is aimed at supporting Member States which have the most need in accessing international good practice and training. Programme beneficiaries are encouraged to become acquainted with the “Compendium of Good Practice and Related Guidelines on establishing and operating a national Fusion Centre”, which was developed by the Programme team and experts from existing national Fusion Centres. With inputs from over 20 countries, the Compendium provides guidance on legislation, mandates, stakeholders, policy, roles and responsibilities, as well as communications approaches.

In programmatic terms, the process starts with national capacity-building consultations or scoping visits, conducted with implementing partners, the United Nations Police Division (UNPOL) and CTED. Programme experts meet national security entities, including Customs administrations, to better understand the challenges they face relating to national-level inter-agency cooperation and coordination, intelligence analysis, and information sharing.

Following these consultations, the Programme develops an evidence-based Action Plan, or “Roadmap”, which ensures that the provided capacity-building support responds to the country’s or entity’s needs.

The Programme also organizes study visits that are delivered by experts of leading fusion

---

*The Programme promotes a “Fusion Centre approach”, whereby national partners come together in a collaborative effort to share resources, expertise and information to maximize their ability to detect, prevent and respond to terrorist and criminal activity. The Programme acknowledges and promotes the role of analysts that are the critical node in such mechanisms.*

---

or counter-terrorism centres around the world. Experts share with the Programme's beneficiaries their experiences in developing and operationalizing their respective centres, including the challenges they faced and how they were overcome. In 2021, the Programme sought guidance and expertise from some of the world's best national fusion and counter-terrorism centres, including CITCO (Spain), CUTA (Belgium), NCTC (Norway), C13T (Colombia), NAC (Russian Federation), and EUROPOL's regional intelligence hub, amongst many others.

The Programme also offers 13-week training that includes 12 courses and a complementary study guide. The training focuses on the role of the analyst and follows a modular or "building block" approach, which aims to improve trainees' skillsets in key work-related areas and provides trainees with a foundation upon which to become a competent analyst.

The Programme delivers the following training courses:

1. An **Introduction to Fusion Cells course** that raises awareness of the Compendium of Good Practices and Related Guidelines on establishing and operating a national Fusion Centre and starts the process of operationalization.
2. An **Ethical Decision-Making course** dedicated to problem-solving skills and critical and creative thinking, bias and relevant decision models.
3. An **Effective Intelligence Writing course** to create clear, concise and accurate reports and recommendations.
4. A **Briefing and Debriefing course** presenting briefing models applicable to specific scenarios.
5. An **Analyst course** on turning information into intelligence (products), which includes the intelligence cycle, the use of analysis tools, collection disciplines, and dissemination skills. The course also covers advanced concepts such as predictive analysis, targeting and threat intelligence.
6. A **Managers course**, to develop the skills, abilities and personal characteristics required to be a good manager.
7. A **threat assessment course** that looks at all aspects of threat assessment creation, collection plans, information analysis, environmental scanning and SWOT analysis, as well as structuring, writing and dissemination processes.
8. An **ethical questioning and elicitation techniques course** that focuses on information

gathering, fact-finding and promoting international good practice on free recall and conversation management models.

9. An **open-source investigations course** that trains analysts in using publicly available information such as social media, internet sites, websites, forums, public records, and reports, amongst others, to conduct intelligence-led counter-terrorism investigations.
10. A (beginner to intermediate level) **Microsoft Excel course** that provides trainees with the required skills to utilize Microsoft's analytical features.
11. An **i2 Analyst's Notebook course** to ensure trainees can operate and benefit from IBM's i2 Analyst's Notebook software.
12. A three-week **train-the-trainers course** for trainees to acquire UNPOL training accreditation.

In 2022, the Programme delivered thirty-four training events to 1,100 participants. Participant feedback collected following each course revealed that the training had a positive impact on their knowledge and skillset in the course subject area. This feedback will contribute to improving future training to be delivered in 2023.

Lastly, the Programme provides Member States' national Fusion Centres with up to three months of expert mentoring to support the centre in implementing standard operating procedures. The mentoring aims to support staff in applying the skills that they acquired from training.

### Focus on Africa

With the increase in terrorist activity in the Sahel region, there is an urgent need to strengthen the often weak inter-agency coordination in Africa. According to the 2023 Global Terrorism Index: "The Sahel region in sub-Saharan Africa is now the epicentre of terrorism, with the Sahel accounting for more terrorism deaths in 2022 than both South Asia and the Middle East and North Africa (MENA) combined. Deaths in the Sahel constituted 43 percent of the global total in 2022, compared to just one percent in 2007." In light of this, United Nations Secretary-General António Guterres voiced particular concern over the situation in Africa and called upon UNOCT to prioritize Africa in its capacity-building efforts.

In addition, a growing number of African countries have or are considering establishing national counter-terrorism or Fusion Centres to prevent and



counter terrorism, making Africa a priority region for the Programme in 2023.

There are currently two established regional Fusion Centres in Africa, namely: *L'Unité de Liaison de Fusion (UFL) – Sahel*, which is based in Algiers, Algeria, and the East Africa Fusion and Liaison Unit (EA-FLU), which is based in Kampala, Uganda. Additionally, the Southern African Development Community (SADC) established the first African Regional Counter-Terrorism Centre in 2023, located in Dar Es Salaam, Tanzania.

Since its launch in 2020, the Global Fusion Cells Programme has supported Botswana, the Democratic Republic of the Congo, Ghana, Mozambique, Togo, Uganda, and the Southern African Development Community (SADC).

In 2023, the Programme will partner with Morocco, Brazil, and the State of Qatar and collaborate with UNOCT's Programme and Training Office in Rabat, Morocco, to support twenty-three new beneficiaries from across Africa. Globally, the Programme has also received requests for support from countries elsewhere, in the Balkans and South America.

### Insights gained in establishing Fusion Centres

International good practice reveals that, for such inter-agency mechanisms to succeed, countries need to ensure a high level of commitment and to have a long-term funding strategy in place. Some of the key findings and lessons learned are:

- A clear mandate, mission statement, and goals are essential to a Fusion Centre's long-term success.
- All levels of government, law enforcement and other public safety agencies, including Customs and border management agencies, must communicate and collaborate to maximize the collecting, developing, and disseminating of information and intelligence.
- Data management is vital to maintain relevant records, and information should be stored in secure information systems.
- As a result of data being shared and communicated, it is important to examine all aspects of interoperability, leverage databases, and address issues of information security.
- Human resources and staffing should be thoroughly considered and, although it is dependent on the individual need, staff must be able to perform analytical functions and provide strategic and tactical assistance. Hence, it is important to ensure staff receive the appropriate training for their roles.
- Human rights-compliant and privacy-protected policies should be developed for personally identifiable information and data.

The UNOCT Global Fusion Cells Programme looks forward to sharing its knowledge and training with more beneficiaries in 2023.

#### More information

[OCT-fusion-centres@un.org](mailto:OCT-fusion-centres@un.org)

---

*International good practice reveals that, for such inter-agency mechanisms to succeed, countries need to ensure a high level of commitment and to have a long-term funding strategy in place.*

---





Are you implementing an  
Advance Cargo Information  
(ACI) protocol?

More than

**107,000**

companies felt secure when

they sent their **4.3** million  
e-trade documents

via the CargoX Platform.



Blockchain Document Transfer



CargoX helps you connect to the  
Global Business Community.



# A Borders Academy in Niger

By Simon Izac, French Customs, and Aboubacar Maifada, Niger Customs

The French and Nigerien authorities have been working on setting up a region-specific national training centre on coordinated border management. Its purpose is to train the internal security services of the countries of West Africa that have seen security in their border areas deteriorating. At this training centre, these services will gain a core body of knowledge and common techniques that they need to ensure their interoperability and counter violent extremism without hindering economic development.

## Managing flows of goods and people in the Sahel: background

For more than 10 years, counter-terrorist units have been witnessing the establishment of caliphates by jihadist groups in the Sahel.<sup>1</sup> These jihadist groups are extending their area of influence, leading to increasing numbers of victims – it is claimed that, in 2021, the violence associated with their activities increased by

70% compared with 2020.<sup>2</sup> Targeting civilians appears to be a deliberate tactic to intimidate local communities, forcing them to cooperate or flee.

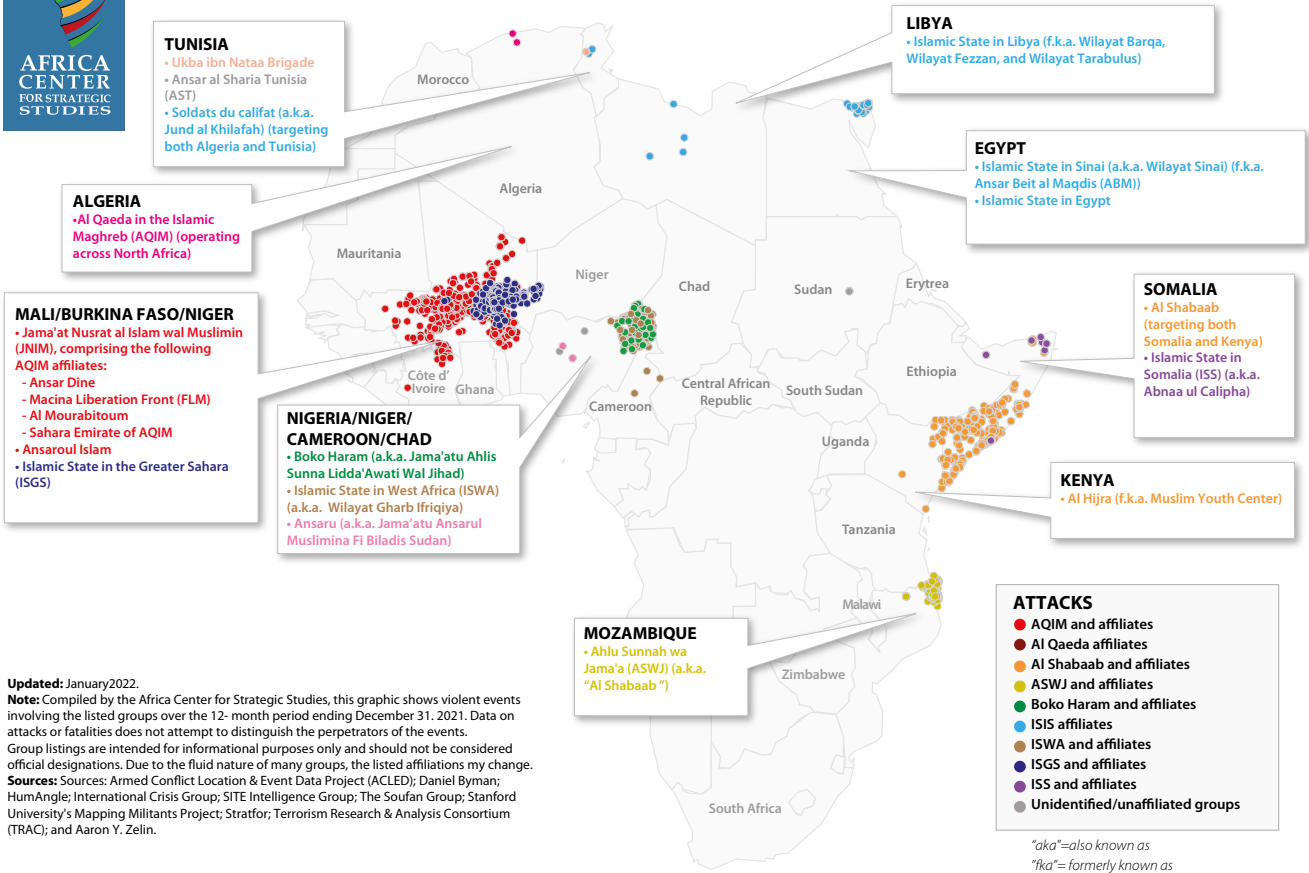
More than half (55%) of the violent events in the region take place in three areas (see annexed map): central Mali, which plays a key role in the preparation of attacks perpetrated in the neighbouring areas; the “Three Borders” area

<sup>1</sup> In geographical terms, the Sahel is the African semi-desert area that lies between the desert climate and the humid tropical climate. The number of states included under the designation “Sahel” fluctuates. The EU Strategy for Security and Development in the Sahel involves the five states of the G5 Sahel: Mauritania, Mali, Burkina Faso, Niger and Chad.

<sup>2</sup> <https://africacenter.org/spotlight/mig2022-01-surge-militant-islamist-violence-sahel-dominates-africa-fight-extremists/>



# AFRICA'S ACTIVE MILITANT ISLAMIST GROUPS



**Updated:** January 2022.  
**Note:** Compiled by the Africa Center for Strategic Studies, this graphic shows violent events involving the listed groups over the 12-month period ending December 31, 2021. Data on attacks or fatalities does not attempt to distinguish the perpetrators of the events. Group listings are intended for informational purposes only and should not be considered official designations. Due to the fluid nature of many groups, the listed affiliations may change.  
**Sources:** Sources: Armed Conflict Location & Event Data Project (ACLED); Daniel Bynan; HumAngle; International Crisis Group; SITE Intelligence Group; The Soufan Group; Stanford University's Mapping Militants Project; Stratfor; Terrorism Research & Analysis Consortium (TRAC); and Aaron Y. Zelin.

straddling Mali, Burkina Faso and Niger; and Burkina Faso's Centre-North region. Incidents involving the same jihadist groups have also been reported on the northern borders of the coastal countries of the Gulf of Guinea (Côte d'Ivoire, Togo and Benin).

The Sahelian border areas, where trade is the main economic resource, were subject to 65% of the violent incidents in 2022. These areas have become sources of financial revenue and influence, for which the armed groups are jostling with the states. In the past, there was little investment in these areas by these states. They focused their border flow management modernization efforts mainly on the transit points channelling economic activity and generating the greatest fiscal revenue (ports, airports and regional transit corridors).

In addition to the movements of goods, there are movements of people, which have increased as a result of the migratory developments fuelled by insecurity. These movements are increasingly attracting the attention of the authorities and

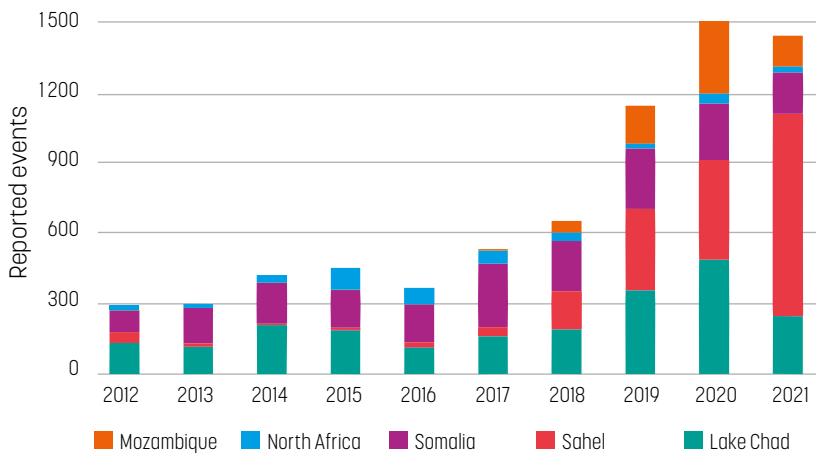
donors. What is more, bearing in mind that jihadist groups circulate in the border areas, control of persons has become a major security challenge there.

Formerly carried out on the roads, the controls are now carried out at the entry points to towns, with extensive searches, unloading of goods, a ban on using certain means of transport, closure of some roads to goods transport, paid escort services and transshipment at the border.

Apart from being a burden on some of the population and on trade, these policies and measures have weakened the economies of the border areas, and armed groups have found a perfect theatre of operations there. There is a normalization of informality, a trivialization of tax avoidance, a reduction in the role of tax, a concentration of wealth by local trading elites, a dependence of local officials on these elites, a development of patronage relationships and inequality of access to cross-border trade as an economic resource for the "cadets sociaux"<sup>3</sup>

3 This term denotes all of the disadvantaged social categories (young people and women), in contrast to their "social elders", who have the authority associated with their age, their position in the lineage and the possession of symbolic and material resources.

### Violence by militant Islamic groups against civilians by areas



Data source: Armed Conflict Location and Event Data Project, based on 2021 events.

(young people, women, members of social groups low down in the traditional hierarchies).

There is therefore a need to ensure that there is a presence not just of security services, but of civil authorities in these areas, in order to offer border communities a response in both security and economic terms, bringing together police forces and bodies with an economic remit, such as Customs.

### Mobilizing and training the internal security forces

The representatives of the armed civilian services, such as Customs officials, more familiar with socio-economic considerations, have proved to be inadequately prepared for the surveillance and control of movements of people and goods. While the donors (United Nations, European Union, G5 Sahel, France, United States and Germany) provide huge support for the training of defence and internal security forces in the Sahel (police, national guard, gendarmerie), the technical workshops offered to the other bodies (Customs, water and forestry services) are relatively short and succeed only in forging a minimal common culture. The mobilization and training of all state bodies seeking to implement coordinated border management should lie at the heart of the security framework.

In their Joint Statement, the Heads of State of the member countries of the G5 Sahel, meeting in January 2020 in Pau, France, also pledged “to take

all measures aimed at speeding up the return of administrations and public services across all the territories concerned by the issue”. The Statement also notes that France and Germany, as part of the Partnership for Stability and Security in the Sahel (P3S) initiative, will provide their support, focusing their “involvement on the training and deployment of staff, including at local level, in the areas of civil administration, internal security (police, gendarmerie, Customs) and justice”.<sup>4</sup>

### A region-specific national training centre in Niger

Niger has a 5,690-kilometre-long border with seven countries: Algeria and Libya to the north, Chad to the east, Nigeria and Benin to the south and Burkina Faso and Mali to the west. Five of the seven borders are marked by growing insecurity as a result of the activities of terrorist or extremist groups, armed bandits and politico-military groups.

A few months ago, Nigerien and French Customs proposed to their governments that a region-specific national training centre on coordinated border management, named the Borders Academy, should be set up. Region-specific national training centres, a concept devised in 1997, “are in line with the French diplomatic strategy of support for state building and the stabilization of crisis regions”.<sup>5</sup> They are “centres for the training of managers, dedicated to improving the expertise of the defence and security forces”<sup>6</sup> of the country that hosts them and countries of the region, or indeed the continent.

The purpose of the new Borders Academy is to train the armed services – gendarme, police, national guard, officials of the forestry and Customs services – to enable them to act in a coordinated manner to counter the various armed groups without hindering economic development. It is about fostering the interoperability of the various services, drawing on the expertise and added value of each individual involved, encouraging the conduct of joint operations at national and regional level and balancing enforcement with support for economic activity. The training offered therefore revolves as much around joint control techniques designed to ensure the safety of the services taking action together, as it does around

<sup>4</sup> <https://www.diplomatie.gouv.fr/en/french-foreign-policy/security-disarmament-and-non-proliferation/news/2020/article/g5-sahel-pau-summit-statement-by-the-heads-of-state-13-jan-2020>

<sup>5</sup> [https://www.diplomatie.gouv.fr/IMG/pdf/brochure\\_presentation\\_envr-09.02.23\\_cle05d146.pdf](https://www.diplomatie.gouv.fr/IMG/pdf/brochure_presentation_envr-09.02.23_cle05d146.pdf)

<sup>6</sup> *Idem*.

awareness-raising among the police forces on the stresses experienced by economic operators on the border and, more generally, the strategies to adopt against violent extremism that balance economic and enforcement action.

There are several reasons behind the choice of Niger as the location for setting up a region-specific training centre:

- the security situation on Niger's borders is not a matter of military emergency;
- the country has only one other region-specific national training centre, dedicated to military health training;
- the various security agencies (police, gendarmerie, national guard, water and forestry services, Customs) are present at all the borders.

The Italian Government, which has been supporting Niger in its commitment to combat terrorism for several years as part of the Bilateral Support Mission in the Republic of Niger (MISIN), has also joined the project. Under the agreement entered into by all the partners, France and Italy are responsible for the financial arrangement and will share the task of steering the project and content creation with Niger. The two European countries will contribute financially to the operation of the centre and provide support for teaching. The Nigerien Government, for its part, will provide the site, the teaching experts and the managerial staff.

### Types of training delivered

The focus of the activities, the "fragile" border, lies at the heart of the training, which is adapted according to the targeted audience:

- senior managers and/or senior officers study state strategy at the border;
- supervisory staff and middle managers follow common theoretical and practical core training on the role of the state at the border and coordinated border management in a situation of insecurity;
- officials of the units of each service are trained to be interoperable in the field. This is about building the capacities of Customs and the water and forestry services in security techniques, and the capacities of the police,

the gendarmerie and the national guard to take account of the economic environment at the border and to adapt their actions in the field.

The merit of a region-specific national training centre is not to train all armed units in the same techniques as those of the police or the army, but to provide each service with the knowledge and techniques it needs so that it can be integrated into a comprehensive border security and economic management system.

Managing the space remains the most demanding aspect for the governance of border regions. The training will, therefore, also cover the collection, management and dissemination of geographical information, including in the form of maps, and the use of spatial analysis tools. Geographical information is associated with many different operational aspects, including the deployment of patrols and the planning of controls, and also the simultaneous analysis of security, fiscal and economic risks. It also facilitates intelligence fusion among departments and, by adding a visual dimension, makes dialogue possible between agents who have different training backgrounds and professional cultures (analysts, statisticians, field agents and decision-makers).

### Project progress and prospects

The call for tenders for the construction of the buildings to house the training centre is expected to be published in the next few months. They will be built on a five-hectare site donated by the Nigerien Government and will form a proper campus with a lecture hall, classrooms, an IT room, a canteen and student rooms.

In 2021, experimental training sessions were given by French Customs, in order to identify the needs of the various departments and to understand the limitations. In 2022, the Security and Defence Cooperation Directorate (DCSD) of the French Ministry of Europe and Foreign Affairs (MEAE) funded and held two educational and module creation workshops with managers from Niger's five internal security forces. There was also a study trip to Côte d'Ivoire in order to understand how the country's International Counterterrorism Academy worked.

Since September 2021, 18 training workshops have already been held for the benefit of more than 350 field officers and managers of Niger's five internal security forces and of other countries

---

*The merit of a region-specific national training centre is not to train all armed units in the same techniques as those of the police or the army, but to provide each service with the knowledge and techniques it needs so that it can be integrated into a comprehensive border security and economic management system.*

---

in the region. They were delivered in lecture rooms and locations provided to Customs.

Specifically, they covered:

- coordinated border management;
- awareness-raising on Customs' functions in economic and tax matters;
- the managerial function (leadership, ethics);
- searches and the detection of caches on land transport;
- the fight against fraud (cross-border crime, wildlife, drugs, weapons and various prohibitions);
- shooting techniques and the safeguarding of weapons;
- security techniques in border controls;
- first aid;
- communication;
- analysis and use of georeferenced data and cartography;
- counter-improvised explosive device (IED) measures.

The Nigerien internal security forces have a pool of Nigerien trainers who, of course, conducted the training, backed up by trainers from countries in the region and French experts.

In 2023, training will be open to other countries of West Africa.

#### **More information**

<https://academiedesfrontieres.net/accueil>

#### **Further reading**

Some of this article is based on information from Cantens, T. (2021). "Border security in Africa: the paradigmatic case of the Sahel as the embodiment of security and economy in borderlands". *Commonwealth & Comparative Politics*, 59(4), 497-520.

<https://www.tandfonline.com/doi/abs/10.1080/14662043.2021.1997191?journalCode=fccp20>





# Supporting humanitarian work: some recommended practices

By Virginie BOHL, senior international expert in devising and implementing strategies to optimize the cross-border movement of humanitarian relief-aid

Humanitarian organizations are some of the actors operating in fragile and conflict-affected situations. This article looks at the constraints they face, and at how Customs administrations can better support their work.

## One in every 23 people needs humanitarian assistance

In December 2022, the United Nations Under-Secretary for Humanitarian Affairs launched the Global Humanitarian Overview 2023,<sup>1</sup> the humanitarian community's most comprehensive evidence-based annual assessment of humanitarian needs and funding requirements. It amplifies the voice of affected people, and it reflects global trends and the drivers of humanitarian need, including conflict, economic crises, disease outbreaks, and the longer-term impact of COVID-19. It is estimated that 339 million people will be in need in 2023, and that one in every 23 people needs humanitarian assistance, especially food assistance. We are indeed facing the largest global food crisis in modern history, driven by conflict, climate change and the threat of global recession.

## Fragile contexts and the constraints on them

Fragility, according to the Organization for Economic Co-operation and Development (OECD), is the combination of exposure to risk and insufficient coping capacities of the state, system and/or communities to manage, absorb or mitigate those risks.<sup>2</sup> In 2022, 1.9 billion people, or 24% of the world's population, were living in fragile contexts.

Fragility from this perspective therefore encompasses fragile borders, defined by the WCO as areas where state agencies, particularly Customs, are unable to operate properly owing to the insecurity created by non-state armed groups.

In a fragile context, the humanitarian community faces constraints that can be intentional or unintentional, and that impede a timely, effective

<sup>1</sup> <https://humanitarianaction.info/gho2023>

<sup>2</sup> OECD (2022), *States of Fragility 2022*, OECD Publishing, Paris, <https://doi.org/10.1787/c7fedf5e-en>.



and principled humanitarian response. The main constraints observed are listed below.

### **Insecurity**

- Violent conflict continues to take a heavy toll on civilians, including aid workers.
- While in some cases, there is a persistence of cross-border movement of relief aid, in others armed violence and lack of security disrupts humanitarian programmes, affecting the population in need.

### **Two governing authorities**

- Negotiation to access the population in need is complex and difficult as trust must be established with both sides.
- Importing humanitarian consignments implies having to comply with two sets of procedures – which often differ – instead of one, leading to financial burdens.
- Humanitarian imports should be exempted from taxes, but often that rule is not respected in territories where two different authorities are present, and humanitarian organizations may have to pay one of the parties or even both.
- Cross-border agencies may face uncertainty in how to clear consignments.

### **Lack of or inadequate procedures**

- There may be a lack of legislation to support humanitarian organizations, changing or ambiguous regulations, or non-implementation of regulations.
- Procedures may exist but not be published and hence remain unknown to the humanitarian community, resulting in delays in meeting administrative requirements. This in turn leads to higher costs of storage, and more distress and suffering for the affected population.
- Decisions such as temporary closures of border posts may not be communicated in a timely manner.

### **Restrictions and sanctions**

- In territories where anti-terrorism legislation applies, there are restrictions on commodities which may be imported (for example, fuel,

armoured vehicles, fertilizers, cement, and medical supplies). Humanitarian organizations can apply for exemptions but the process is slow, costly, and usually requires trained legal staff.

- The United Nations Security Council also imposes sanctions, which range from comprehensive economic and trade sanctions, to arms embargoes, travel bans, and financial or commodity restrictions. Among those, asset freeze sanctions prohibit certain activities which humanitarian organizations are often unable to avoid, such as paying UN-designated individuals or groups for various services, such as food, drink, or transportation, or paying taxes and fees, such as road tolls or utility bills. In December 2022, the Council adopted Resolution 2664,<sup>3</sup> which introduces across all existing and future UN sanctions regimes a humanitarian exemption from the asset freeze measures that ban these kinds of transactions, with a view to facilitating humanitarian provision of goods and services. The implementing rules have yet to be adopted.

### **What can Customs do to support humanitarian work in a fragile context?**

In fragile contexts, national institutions need to adapt procedures. In a conflict situation especially, Customs administrations and humanitarian actors must engage in the design of processes enabling the delivery of humanitarian assistance in a timely and cost-effective manner. Below are some measures and actions to be taken:

- Identifying threats and risks early: countries must establish monitoring and alert systems that identify emerging issues before they become embedded, and Customs must be part of the preparation and response mechanism. Political changes (including elections or other transitions of power) should, for example, be closely monitored.
- Understanding humanitarian principles and building trust: Customs authorities must understand and respect humanitarian principles, and humanitarian partners must understand and respect national rules and regulations.
- Defining objective criteria for access to special legal and operational facilities: subject to

---

*The One-Stop-Shop established in Erbil (Iraq) assisted with the Customs clearance of humanitarian cargo arriving in the Kurdish Region of Iraq and provided coordination with all relevant authorities. As a result, Customs clearance lead-times decreased by 71%, benefiting 92 organizations, which imported more than 22,300 metric tons of humanitarian aid between December 2016 and November 2018.*

---

<sup>3</sup> <http://unscr.com/en/resolutions/doc/2664>

existing international law, it is the prerogative of originating, transit and affected states to determine which assisting humanitarian organizations will be eligible to receive special legal and operational facilities (versus facilities offered to any humanitarian organization). It is recommended that states define objective criteria to determine which humanitarian organizations will be granted such facilities for the importation of humanitarian assistance. Examples include compliance with minimum standards, with humanitarian principles,<sup>4</sup> with the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief,<sup>5</sup> and with high operating standards (for example, ISO certificates for supply processes, inventory controls,<sup>6</sup> and the Sphere Project<sup>7</sup>).

- Establishing effective communication channels between humanitarian partners and governmental agencies involved in the import process: humanitarian partners must know which entry points are available, for example, and should be able to discuss how to avoid delays in the import of humanitarian aid, with Customs taking the lead to explore solutions with other agencies. It is important to use technologies to do so. If IT systems do not allow this, it is good practice to establish a WhatsApp group for cross-border agencies and humanitarian organizations to easily communicate. The most recent example is the

WhatsApp group created for the “Import and Customs processing on transit to Sudan.”<sup>8</sup>

- Multi-institutional arrangements should establish coordinated working methods between agencies involved in the import of goods: the establishment of a One-Stop-Shop (OSS) mechanism in designated entry points that are safe and secure for both Customs officers and humanitarian staff is a practice which has demonstrated its efficiency. For example, the OSS established in Erbil (Iraq) by the Coordination Crisis Centre and the Ministry of Interior assisted with the Customs clearance of humanitarian cargo arriving in the Kurdish Region of Iraq (KRI) and provided coordination with all relevant authorities. As a result, Customs clearance lead-times decreased by 71%, benefiting 92 organizations, which imported more than 22,300 metric tons of humanitarian aid between December 2016 and November 2018.<sup>9</sup>

“Leave no one behind” is a universal value. However, many people at fragile borders are being left behind because it is often harder, more expensive and riskier to find and assist them. By working together, Customs and humanitarian actors can help ensure that practices and policies do not put unnecessary administrative and financial burdens on humanitarian assistance in these areas.

#### **More information**

[Virginie.bohl@gmail.com](mailto:Virginie.bohl@gmail.com)

<sup>4</sup> [https://www.unocha.org/sites/unocha/files/OOM\\_Humanitarian%20Principles\\_Eng.pdf](https://www.unocha.org/sites/unocha/files/OOM_Humanitarian%20Principles_Eng.pdf)

<sup>5</sup> <https://www.icrc.org/en/doc/assets/files/publications/icrc-002-1067.pdf>

<sup>6</sup> <https://www.interaction.org/documents/interaction-ngo-standards/>

<sup>7</sup> <https://spherestandards.org/humanitarian-standards/>

<sup>8</sup> For more information, please contact [impacct.2021@gmail.com](mailto:impacct.2021@gmail.com).

<sup>9</sup> <https://reliefweb.int/report/iraq/logistics-cluster-iraq-closure-report-december-2019>

# Web Client by strategyObject



Single Window?  
How about a **Single App**  
allowing global integration with  
zero geographical boundaries.

Web Client seamlessly integrates with your existing Customs ecosystem to facilitate a streamlined clearance process. Accessible across all devices, online or offline with a captivating user experience. Empower traders and stay in control.



Unlock the trade  
experience your  
community deserves.



# Morocco's Customs Service establishes special status for its officials

By the Moroccan Customs Service

The date of 10 December 2020 marked the history of the Moroccan Customs Service. On that date, Morocco's Governing Council approved the draft Decree governing Customs staff regulations. This article reviews the significant provisions of the Decree and the important changes it introduces.

The Customs and Excise Administration of the Kingdom of Morocco (ADII) is overseen by the Ministry of the Economy and Finance. This Ministry is responsible for controlling the international movement of goods and persons for the purposes of collecting duties and taxes, combatting fraud and illegal trade and ensuring security. By continually modernizing and adapting its procedures to the needs of commercial operators, it also contributes to the establishment of an attractive environment and plays a major role in the country's economic development.

To achieve its various missions, the Administration focuses on improving its human capital by enabling staff to develop their professionalism

and skills. In December 2022, it also amended its staff regulations and introduced a regulatory framework that reflects those missions, empowers its officials, provides them with a clear framework for their actions and protects them.

## Prior to the reform

Customs staff regulations may differ from country to country and may be military, paramilitary or even civil in form. In Morocco, the Customs Service is divided into two main categories of officer: Customs unit officers and Customs office clerks. It is a paramilitary force, which means that all personnel are entitled to carry a service weapon. Until quite recently, however, the Customs Administration was governed by a

variety of statutory provisions which applied to civilian personnel, particularly the General Civil Service Statute and interministerial statutes, thus obscuring the special and specific nature of its security mission with all the ensuing constraints: special working hours, night work, military training and discipline, uniforms, the carrying of arms, etc.

This had negative consequences in terms of managing the Customs body, particularly in relation to inappropriate recruitment criteria, career structure and conduct. To be recruited as surveillance officers, for example, within a unit, applicants had to be between 18 and 45 years of age, while physical and mental aptitudes were not specified. In terms of conduct, previously there were two disciplinary systems, one for Customs unit officers and the other for Customs office clerks. In addition, the rules applying to unit officers differed according to whether they were commissioned officers or non-commissioned officers, with any non-commissioned staff being denied certain guarantees of defence that officers benefitted from. The respective sanctions were applied to them without the need for a hearing before a disciplinary panel, which, because it was evenly constituted (representatives of the Administration and representatives of personnel) was in a position to safeguard the right to defence. The procedure provided only for a request for clarification to be submitted to the officer concerned. With respect to the career status, the previous regulations made no provision for recognition for officers who died in the performance of their duties in connection with missions to combat smuggling and other illicit trafficking.

### Completion of work to be carried out

The new legal arrangements were published in Official Journal No. 6948 of 31 December 2020. This may rightly be regarded as the outcome of one of the most important strategic projects undertaken by the ADII. Sponsored by the Director General of Customs, it was also supported by the Minister for the Economy and Finance, who was convinced of its importance. The new Staff Regulations arose out of the work of the HR team, which drew them up in full prior to their submission to an internal and external consultation procedure involving, in particular, the Ministry for the Modernization of the Public Administration, the Ministry of Finance and the Government General Secretariat.

In the planning stage, the team sought to adapt the rules of the Staff Regulations to the realities and needs of improved human resource management adapted to the particular missions of a paramilitary administration such as the ADII. A comparative assessment was carried out with a view to building on the good practices of other bodies and other Customs administrations.

If committing to such a project was already a challenge in itself, it was then necessary to ensure that the measures were applied and to update all ADII management systems. The third challenge was to ensure the engagement of existing staff.

### New provisions

A new unified legal and regulatory framework applicable to all Customs officials was created, with the following major features:

- The rules as a whole that form the basis of military discipline: hierarchical relationship, penalties, prohibition of the consumption of certain products, etc. The new statute established a single unified disciplinary system providing the same guarantees for all personnel, while establishing a dynamic link between the system of conduct and the reward scheme, thus allowing penalties to be written off in the event of receiving an award.
- A new code of good conduct: introduced by the Minister for the Economy and Finance, this corrects shortcomings in the area of sexual harassment, abusive use of social networks to disseminate confidential information, misuse of the image of officers or of the Administration, etc.
- The rules relating to the bearing of arms and wearing of the uniform.
- Provisions relating to work outside normal working hours.
- New recruitment criteria: this involves, in particular, defining the physical and age requirements for joining the Administration. For example, to become surveillance officers, applicants must be between 18 and 25 years of age and must have a certain visual acuity, height and physical condition in particular.
- New conditions for promotion: the new Staff Regulations maintain the existing conditions

---

*This may rightly be regarded as the outcome of one of the most important strategic projects undertaken by the ADII. Sponsored by the Director General of Customs, it was also supported by the Minister for the Economy and Finance, who was convinced of its importance.*

---

but add the possibility of promotion following successful completion of the Administration's professional aptitude tests. A grading system has also been introduced among certain categories of officials (technicians, editors, technical assistants) who had special interministerial status. The posts of Inspector General of Customs, Controller General of Customs, General Engineer and Architect General of Customs were also created.

- The award of 18 months' seniority or exceptional promotion for officers who have carried out outstanding operations or who have suffered serious injuries in the course of their duties, and the award of the same seniority to officers who have been killed on duty, to the benefit of their heirs.
- The adoption of a new promotion scale for certain categories of officers who cannot go beyond remuneration scale 8, such as technicians and editors.
- The adoption, for the first time, of moral reward, i.e. "encouragement, honourable mention and witness of satisfaction"; such rewards may strike off certain disciplinary penalties.

### **Sense of belonging and project ownership**

This special status of ADII personnel also seeks to strengthen the sense of belonging of officers to the Moroccan Customs family, whether they are unit officers or Customs office clerks. After publishing the new regulations, the Administration launched a wide-ranging information and communication campaign aimed at all central and regional personnel, and involving presentations and open days. The objective was not only to inform officers but, in particular, to celebrate their success and share the feeling of pride in finally being covered by special staff regulations that govern Customs officers. While inclusion in the new regulations was not obligatory but conditional upon filing an express request, personnel as a whole have been eager to prepare their applications well before the expiry of the one-year deadline that has been laid down.

#### **More information**

[S.ALILA@douane.gov.ma](mailto:S.ALILA@douane.gov.ma)



© Morocco Customs Service



© Morocco Customs Service

# Gender Equality and Diversity: a look into the assessments made with Ghana, Togo and Côte d'Ivoire

Launched in 2013, the *Gender Equality Organizational Assessment Tool*<sup>1</sup> (GEOAT) enables Customs administrations to self-assess their existing policies and procedures on gender equality in order to identify areas where improvement may be needed. While they can conduct the assessment on their own, Customs administrations can also receive support from the WCO Secretariat to obtain a more comprehensive evaluation. As at June 2023, the WCO Secretariat has worked with the Customs administrations of Brazil, India, South Africa, the Philippines, Liberia, Zambia, Ghana, Côte d'Ivoire and Togo, within the framework of different capacity building programmes. During COVID-19, some of the assessments were made remotely. All resulted in comprehensive reports, including recommendations adapted to the specific context of each country.

The most recent assessments, with Ghana, Côte d'Ivoire and Togo, were carried out within the framework of the West Africa Security Project (WASP), which is implemented by the WCO Secretariat and funded by the German Federal Foreign Office. By including a component on Gender Equality and Diversity in the Project, the two Project partners acknowledge the importance of gender equality and diversity as prerequisites for achieving sustainable development and for ensuring peace and security.

The WCO recommends implementing gender equality and diversity on a cross-cutting level, in internal policies (human resource management), external policies (border operations and engagement with stakeholders), and in overall coordination, monitoring, and evaluation mechanisms. Within the framework of the WASP, a WCO Secretariat expert first analysed each of these areas using the GEOAT and its indicators.

In the coming months the Project will also focus on:



© AdobeStock

- Conducting training, leveraging the WCO blended training package “Advancing gender equality and diversity in Customs”.
- Supporting the drafting of gender equality action plans for the three Customs administrations.
- Updating the GEOAT, adding new chapters and indicators (the update was discussed at the meeting of the Virtual Working Group in May 2023).
- Organizing a workshop for the partner Customs administrations to present the findings and conclusions of the Project.

## Technical assistance

The assessment is typically carried out over the course of 5 days. With the agreement and support of the partner administration, the WCO expert meets with different departments and units, both at headquarters and ports of entry, as well as with various stakeholders from the public and private sector.<sup>2</sup> The latter usually include the ministries in charge of gender issues, associations of women Customs officers, representatives of associations of women traders, international organizations, and development agencies. Drafting

1 <https://www.wcoomd.org/-/media/wco/public/global/pdf/topics/capacity-building/activities-and-programmes/gender-equality/gender-equality-assessment-tool.pdf>

2 Meetings with these stakeholders were not possible during the COVID-19 pandemic and therefore were not organized in all countries.

of the recommendations is done at a later stage, and may include some iteration with the administration to obtain additional information or clarify some areas. The final report is then sent to the administration's senior management team, who are invited to inform the Secretariat of the recommendations they intend to endorse.

As Ghana, Côte d'Ivoire and Togo had not participated in any of the activities carried out under the WCO umbrella to develop and share knowledge on GED, the assessments were a great opportunity for the Secretariat to learn about their practices and to get them engaged in the work done in this area.

### Ghana

In Ghana, the WCO expert met with several departments, including Human Resources and Training, Communication and Public Affairs, Ethics and Good Governance, Strategy and Research, and Policy and Programmes, as well as with representatives from the Customs Ladies Club and from different field offices. Conversations were also held with private sector stakeholders, representatives from the Ministry of Gender Equality, and other border agencies, which allowed a broader view of the situation on gender equality in Ghana. A visit was also made to the port of Tema to observe field operations.

### Togo

In Togo, the WCO expert met with several Customs departments, including Human Resources, Training, Communication, Prevention and Fight against Corruption, and Studies and Strategic Planning, as well as with representatives of the Customs Women Association. A visit was also made to the Lomé port and the Sanvee-Condji joint checkpoint, located on the border between Togo and Benin, which allowed for in-depth discussions on the work in these stations and the procedures. A meeting was held with the Autonomous Public Establishment for the Operation of Lomé Markets and a group of women traders to better understand their situation and unique challenges. Finally, discussions were held with representatives from the Ministry of Social Action, Promotion of Women and Literacy of Togo to align the findings of the assessment with the national policies promoting gender equality in Togo, and to identify potential avenues for forward collaboration with Customs.



### Côte d'Ivoire

In Côte d'Ivoire, the WCO expert met Customs officers from several units, including the Gender Cell, Human Resources, Communication, Integrity, and the Customs Training School. She also spoke with the President of the Côte d'Ivoire Association for Female Customs Officers (Amicale des Douanières Ivoiriennes). She also visited the Abidjan port and airport, and the Aboisso-Noé border station on the land border with Ghana, for a more in-depth discussion on the work in these stations and the procedures. Conversations were held with private sector stakeholders, including women traders. In addition, a meeting was held at UN Women premises in Abidjan, which also included representatives of women traders, to leverage synergies and identify avenues for forward collaboration.

### Common challenges

The Secretariat has identified several challenges shared by the three administrations.

#### **Lack of knowledge on the importance of GED and how it relates to the work of Customs**

Promoting GED within Customs is not just a question of fundamental rights, but also a prerequisite for creating efficient administrations which can adapt to the fast-moving challenges that globalization and modern society bring. Enhancing knowledge among staff and awareness-raising on gender equality and diversity-related issues is key to fostering a change of mindset among all staff. The administrations should conduct specific training to address GED issues and include the WCO training modules as part of their training curriculum for Customs officials.

#### **Lack of continuity of efforts**

Promoting GED goes beyond the issue of equal representation. Staff from different backgrounds and of different genders often have different needs, constraints and preferences,

In Côte d'Ivoire with Customs officers and women traders

---

*Several Customs administrations have expressed their interest in working with the Secretariat on GED issues and in receiving further support on how to use the GEOAT. Donors wishing to fund GED-related activities are invited to contact the Capacity Building Directorate.*

---



and therefore can be affected differently by policies, regulations and working arrangements, for example. Administrations need to take this into account and ensure that gender equality and diversity is considered in everyday policies, from communication to human resources, and in relations with external stakeholders.

### **No transversal approach**

“Gender mainstreaming” consists of integrating the concerns and experiences of women as well as men in the planning, implementation, monitoring and evaluation of policies and activities. While there is an awareness of gender equality and diversity issues in the three administrations, and some initiatives have been launched, such as the creation of the Associations of Women in Customs, there is a need to develop a greater understanding of how gender equality and inclusion can be implemented on a cross-cutting basis, for instance in terms of establishing an action plan with clear objectives that could be monitored over time.

### **Lack of written policies and documents**

Although practices are sometimes in place, they are not necessarily formalized or documented, which hinders consistency and sustainability. The administrations should have a policy or action plan promoting GED, and a dedicated unit or working body in charge of holistically working on implementing these issues on a cross-cutting level within the organization. The association of women Customs officers which each has established each has a work plan, but participation in the association remains an extracurricular activity outside regular work duties.

### **Lack of data and monitoring frameworks**

Lack of needs assessments and segregated data prevents administrations from identifying gender-specific trends and gaps, and from measuring progress over time. Data related to training and career development, and from employee and stakeholder satisfaction surveys, should be collected and disaggregated by sex.

### **More funding is needed to meet support requests**

Several Customs administrations have expressed their interest in working with the Secretariat on GED issues and in receiving further support on how to use the GEOAT. To respond to these requests, the WCO is currently creating a pool of Recognized Experts on GED.



In Ghana with representatives from the GRA Ladies Club



In Togo, at the Sanvee-Condji joint checkpoint, located on the border between Togo and Benin

As a first step, a train-the-trainer workshop was organized at the WCO Headquarters in Brussels in March 2023. It brought together 20 pre-selected English-speaking Customs officers and was funded by the Swedish International Development Cooperation Agency (under the WCO/SIDA Trade Facilitation Customs Modernization Programme for Sustainable Development in Sub-Saharan Africa) and by the United Kingdom's His Majesty's Revenue and Customs (under the WCO/UNCTAD/HMRC Accelerate Trade Facilitation Programme). As a second step, these experts will be called upon to support capacity building activities and pass a final evaluation.

Once funding is available, the WCO will continue supporting Customs in their efforts to apply gender mainstreaming and ensure they are inclusive. Donors wishing to fund GED-related activities are invited to contact the Capacity Building Directorate.

### **More information**

[capacity.building@wcoomd.org](mailto:capacity.building@wcoomd.org)

# GEA's Customs capability database

By Carlos Grau Tanner, Director General, Global Express Association

The Global Express Association (GEA) collects key performance indicators on the efficiency of Customs processes in currently 120 countries and territories. They are structured in a fully searchable online database that is publicly available on the association's website.

The Global Express Association represents the three leading express delivery carriers: DHL, FedEx and UPS. Serving clients of all sizes in 220 countries and territories, express delivery has become one of the key conveyor belts of international trade. GEA's members pick up, transport and deliver over forty million shipments every day, of which well over a million are international shipments of goods (as opposed to documents). There is a door-to-door integrated service that combines surface and air transport seamlessly, and provides fast Customs clearance. It has become part of the business model of many of its customers.

To provide this sophisticated level of service, express delivery carriers have invested heavily in their own networks. Together, GEA members operate around 1,500 airplanes (owned or leased), and a fleet of around 300,000 ground vehicles – from e-bikes to heavy trucks, and of course, delivery vans, which are perhaps their most visible symbol around the world.

In addition, express delivery carriers have pioneered the use of advance electronic information. Alongside the fast physical flow of small parcels that defines the express business, there is a parallel flow of data associated with each shipment. This is key for internal management purposes, to track-and-trace each shipment and, where possible, to accelerate the clearance of express parcels through Customs.

All the investments that express delivery carriers constantly make to improve their network give them firm administrative and physical control over the parcels. Shipments tend to stay in an express carrier's network throughout their journey. Track-and-trace capability allows carriers and their clients to monitor the progress of a parcel from pick-up to delivery. Clients appreciate the speed, reliability and security associated with this particular way of conveying goods and documents.

But, at the same time, all these means and technology do not give express carriers control over border clearance processes. Here, a partnership with Customs and border agencies, based on mutual trust, is key to making sure that, where shipments do not present any particular risk, these processes happen as fast as possible. Or, at least, in a predictable manner.

Some customers may value predictability over speed. It is sometimes more important to know that compliant shipments – say, an important component – will be delivered at a factory's doorstep at a precise, recurrent time, than to know that, for the most part, many of them will be delivered very fast (and others perhaps less so). Although, of course, that matters, too. For others, speed is paramount. Ask an airline or a shipping company that urgently needs a spare part for one of its planes or ships, stranded thousands of miles away from a hub or port of call.

This is precisely the reason why GEA started collecting information, over a decade ago, on Customs capabilities worldwide for its members. It was important to gauge how efficient – or inefficient – border processes were in a given country and territory. In turn, this would allow GEA members to gauge the speed and reliability with which parcels would be cleared at the border.

Trade facilitation matters, and not only to express carriers or their clients. The World Trade Organization's own estimates "show that the full implementation of the TFA could reduce trade costs by an average of 14.3% and boost global trade by up to USD 1 trillion per year, with the biggest gains in the poorest countries".<sup>1</sup>

Country managers for the three carriers, as well as regional express associations, are asked to measure a list of key performance indicators defined by GEA's members. The results were initially listed in a series of country (or, as the case may be, territory) profiles, and made available on the association's website. Over time, the profiles were turned into a searchable database and also published online.

With the advent of the World Trade Organization's Trade Facilitation Agreement, and the evolution of trade itself, GEA realized two years ago that the time had come for a thorough review of the

database itself. The association thus embarked on a reformulation of the questionnaire that feeds the database, with two aims in mind.

Firstly, to review the relevance of some of the key performance indicators measured.

Secondly, to align the questionnaire as far as possible with the existing international instruments on Customs efficiency: the TFA, mentioned above, and the World Customs Organization's Revised Kyoto Convention and Immediate Release Guidelines.

This new database was launched earlier this year. Like its predecessor, it is publicly available on the association's website ([www.global-express.org](http://www.global-express.org)). Before describing it in more detail, there are four important caveats worth mentioning.

Firstly, GEA's objective is not to rank countries or point fingers at anyone. Rather, it wants to offer a contribution to the discussion on improving trade facilitation and on the level of implementation of the most important international treaties on this matter.

Secondly, the database reflects the point of view of express delivery carriers. As mentioned earlier, express delivery is a very specific business model when it comes to logistics. Do not expect to find information about border processes or clearance delays at seaports, or railway entry points. Express carriers do not use them.

Thirdly, it reflects GEA members' own practical experience. The database is fed with first-hand information collected from the three express companies' country managers. Occasionally, there have been discrepancies between what a Customs Code may provide for, and how it is practically implemented (or not) at the border. In such (rare) cases, the database reflects the carriers' experience.

And last but not least, GEA makes it abundantly clear that the information on its database cannot be considered, under any circumstances, to be official Customs information. While the industry makes a constant effort to keep it as current as possible, not all the information in the database may always be up-to-date. Where users of the

1 [https://www.wto.org/english/tratop\\_e/tradfa\\_e/tradfa\\_e.htm](https://www.wto.org/english/tratop_e/tradfa_e/tradfa_e.htm)

database come up with observations or even corrections, we do take them into consideration.

The key performance indicators that the database measures are structured into three main themes: Transparency and Predictability; Customs Efficiency; and Post-Release Processes. Two additional sections record a country or territory's standing in the WTO Trade Facilitation Agreement and the WCO Revised Kyoto Convention. For example, are they parties to them and, if so, since when?

The Transparency and Predictability section features a list of six questions, which in some cases include sub-questions. They refer to the publication of laws, regulations and procedures; the ability to comment on changes; and restrictions that may affect express delivery clearance, such as weight and value thresholds.

The Customs Efficiency section lists 13 questions and their sub-questions. They focus on issues such as formalities; the ability to process electronic information and carry out automated risk assessments; opening hours; typical release times for the various categories of shipments under the Immediate Release Guidelines taxonomy; and the acceptance of electronic documents and scanned copies of physical ones, etc.

This section also contains information on the existence (or not) of two important thresholds: *de minimis* thresholds under which no tax or duty is collected; and informal entry thresholds under which border formalities are simplified for dutiable shipments.

It is worth pausing here for a moment to mention that the Customs capability database is the most visited page on GEA's website, with several hundred visitors a month – not bad, for something that remains quite a technical subject, after all. And of all the information on the database, *de minimis* thresholds repeatedly make it to the top of the popularity podium. GEA's dataset on *de minimis* has been quoted in many academic papers and is also frequently sought by traders large and small, even if, as explained above, it cannot be considered official Customs information. This may serve as an indication of the importance of some processes for e-commerce.<sup>2</sup> So much so,

that one of the new features launched with the revised database is an interface that automatically generates a table of *de minimis* thresholds at the touch of a button, based on the latest information available.

Lastly, the Post-Release Processes section is arguably shorter, with four questions and sub-questions. They focus on the availability and timing of administrative and judiciary appeals; valuation techniques; and processes associated with the seizure of shipments that infringe intellectual property rights.

The database provides various interfaces to retrieve the wealth of information it contains.

First, it allows users to view and print the traditional country (or territory) profiles, in which all information available is presented in one go.

But beyond this, it also allows users to search specific information by keying in a word. If you type "electronic" into the search box, all questions containing that word will be listed, such as, for instance, "Does Customs or any other agency accept *electronic* supporting documents?" The user can then select up to three listed questions, and either ask the system to provide *all* answers for 119 countries and territories, or narrow them down by means of a drop-down menu. For instance, selecting "yes" in the case of the question above would yield a list of countries and territories that do accept such documents.

The third option is a world map associated with a drop-down menu that lists all questions on the database. By pulling down the menu and selecting a question from it, the map will show, in colour-coded patterns, the different answers, country by country (or territory). For instance, if the user selects that same question on electronic documents, a map will show where they are or are not accepted, or where we do not have relevant data. Importantly, we have added remarks to fine-tune the answers given. For instance, a "no" may be associated with an explanation such as "Originals must be submitted with entries". Placing the cursor on the specific country or territory on the map will produce a pop-up window with the name of the country and territory and any comments or remarks linked to the answer.

---

***GEA invites all WCO Members to take a look at their profile on the database. We may not always be right, or up-to-date. And occasionally, we might disagree on a matter of interpretation. But it is our intention to enter into dialogue with countries so that this tool is highly accurate.***

---

<sup>2</sup> GEA considers that *de minimis* thresholds are an important tool for facilitating low-value shipments typically generated by online transactions. But it has also made a proposal on how the collection of revenue for dutiable low-value shipments could be simplified in a way that would benefit authorities, small traders and carriers alike. Details are available at [www.global-express.org](http://www.global-express.org).

It is GEA's intention to update the information on the database as it becomes available, so that it stays as up-to-date as possible. In addition, it will launch yearly reviews to ask the three carriers' country managers to pore through their country or territory profile and report any changes. It is a time-consuming effort that demands additional attention from colleagues who are already very busy doing their daily jobs. Inconsistencies or inaccuracies are therefore inevitable, but the association strives to control the quality of the information as thoroughly as possible.

GEA invites all WCO Members to take a look at their profile on the database. We may not always be right, or up-to-date. And occasionally, we might disagree on a matter of interpretation. But it is our intention to enter into dialogue with countries so that this tool is highly accurate. In the end, our common aim is to have border processes that are as efficient as possible, so that countries are connected to global supply chains and their export industries remain highly competitive, to the benefit of authorities, businesses and consumers alike.

#### **More information**

[www.global-express.org](http://www.global-express.org)



## Efficient centralization and standardization of your entire export control management – globally

**The management of export control is burdensome.** Exporters have to stick to a lot of complex and regularly changing export control regulations covering denied party list screening, license determination, export control classification and many more. Traders struggle to effectively fulfill all those requirements without having the right tools in place.

MIC's Export Control Management Software ECM covers all of this.

MIC ECM helps the compliance professional to automate and monitor the complicated export compliance functions and processes, which is also supported through the use of artificial intelligence and machine learning (AI&ML).

**It provides a broad spectrum of functionalities,** e.g. the screening of numerous sanction lists, integration into various ERP systems, continuous updates of the lists, identification of licensable goods and corresponding audit trails. MIC ECM simply reduces risks and costs associated with global trade and it supports tracking of the entire process to ensure maximum efficiency.

You want to know more about MIC ECM? Please contact us:

#### **MIC**

Tel.: +43(0)732-778496

[sales@mic-cust.com](mailto:sales@mic-cust.com)

[www.mic-cust.com](http://www.mic-cust.com)

**mic** managing  
international  
customs & trade compliance

# Fighting corruption in the form of gift-giving: the experience of Indonesia Customs

By the Directorate of Internal Compliance, Directorate General of Customs and Excise, Indonesia

Under the leadership of President Suharto, Indonesia built one of the world's largest bureaucracies. It suffered from a range of problems including rampant corruption, inefficiency and poor service delivery. Following democratization in 1998, the country's political leaders experimented with various public administration reforms. The Directorate General of Customs and Excise (DGCE) was one of the Ministry of Finance departments to pilot the reform of bureaucracy back in 2002. With the improvement of integrity being one of the key expectations of public and private stakeholders, the reform addressed corruption in all its forms, including 'gratification'.

## Bribery versus 'gratification'

Indonesia adopted two laws concerning corruption in 1999 and 2001 respectively: Law No. 31 on the Eradication of the Criminal Act of Corruption, and Law No. 20 amending Law No. 31. These regulate seven types of criminal corruption:

- an act that causes a loss of state finance,
- bribery,
- embezzlement in office,
- extortion,
- fraud,
- a conflict of interest in procurement, and
- gratification.

Bribery means actively and intentionally giving or promising a reward to a civil servant in the hope that it will help accelerate a process and make it smoother. It involves a meeting of minds between the bribe giver and the recipient. Bribery occurs when there is a deal between the two parties.



Gratification, by contrast, is the receipt by civil servants or state administrators, by virtue of their position, of a gift in the broadest sense, in a manner which is incompatible with their obligations and duties. This includes the provision of money, goods, rebates (discounts), commissions, interest-free loans, travel tickets, accommodation, tourist trips and free medical treatment. There is usually no meeting of minds between the giver and the recipients. However, the gratification can be said to have hidden purpose: the gift is intended to help the giver in future when doing business with the official concerned.

The punishment for the giver or the recipient, is a prison sentence of a minimum 4 years and a maximum 20 years, and a fine ranging from IDR 200,000,000 to IDR 1,000,000,000.

Recipients must report any gifts received to Indonesia's Corruption Eradication Commission (KPK) no later than 30 working days from the date on which the gratuity was received to determine whether it belongs to the recipient or the state. Enforcement is carried out through spot checks, regular inspections or investigation of complaints. A whistle-blower system enables people to communicate information on, or allegations of, such acts. Failure to report these gifts indicates that the recipient is corrupt. The recipient is obliged to prove that the gift they have received is not a bribe and is not incompatible with their position and duties if the value of that gift is IDR 10 million or more (reversal of the onus of proof). For amounts below IDR 10 million, the prosecutor is required to prove that the gift is bribery.

There are specific exemptions for gifts that are not classed as 'gratification'. For example, government officials may accept souvenirs from meetings, workshops, seminars, conferences or training activities, or accept gifts obtained from a relative or by marriage, as long as there is no conflict of interest for the recipient.

### **Gratification control units**

Withing the DGCE, the Directorate of Internal Compliance is in charge of ensuring compliance with the law and undertaking investigations. As the rules relating to gratification are rather complex, the DGCE soon realized that many Customs officers did not understand when gratification was an actionable crime and when

it was not, let alone the correct way to report or hand over the gifts.

In 2013, the Corruption Eradication Commission and the Ministry of Finance decided to sign a Memorandum of Understanding (MoU) to support each other in implementing gratification control. To strengthen this function, in 2015 the Ministry established a dedicated unit in charge of such control within the Directorate of Internal Compliance.

The newly created Gratification Control Unit was set up to:

- disseminate information on regulations related to gifts classed as gratification in order to remove ambiguity,
- coordinate the implementation and effectiveness of controls,
- identify risk areas,
- propose measures to prevent corruption and favour integrity,
- receive reports from employees and coordinate with the Corruption Eradication Commission.

Initially, the main focus was to familiarize officials with the concept of gratification. Over the years, it shifted towards the development of a reporting culture within the DGCE.

Understanding that controls on gratification could not be handled by a single unit, in 2017 the DGCE established 136 new units deployed as follows:

- one coordinating Gratification Control Unit in the Inspectorate General of the Ministry of Finance,
- one Gratification Control Unit in the Directorate of Internal Compliance of the DGCE (level 1),
- 23 Gratification Control Units in DGCE regional offices (level 2),
- 112 Gratification Control Units in DGCE local offices (level 3).

Units at levels 1 and 2 comprise 4 officers, and those at level 3 three officers. All of these officers worked within the Directorate of Internal Compliance before being appointed and were trained by their peers or by the officers of the Corruption Eradication Commission.

Each level 3 unit reports to the level 2 unit in its region, which in turn reports to the level 1 unit.

---

*As the rules relating to gratification are rather complex, the DGCE soon realized that many Customs officers did not understand when gratification was an actionable crime and when it was not, let alone the correct way to report or hand over the gifts.*

---

The level 1 unit conducts an annual survey of employees on the work of the units at levels 2 and 3. The idea is to identify areas of concern and ways of improvement. The survey shows that employees have a positive view of the units and consider that they help to minimize the risk of corruption.

In 2020, a second MoU was signed between the Ministry of Finance and the Corruption Eradication Commission, providing for:

- access to experts for training purposes,
- information and data exchange between the two parties,
- joint research,
- support in the management of state-owned property, confiscated goods, and goods regarded as gratification,
- the development of a corruption prevention programme,
- human resource development and capacity building.

In 2021, the reporting procedure was digitalized through the introduction of a form on the DGCE website and a mobile app.

In 2022, the units had become a key asset of the Corruption Eradication Commission. They had developed an annual work plan which included:

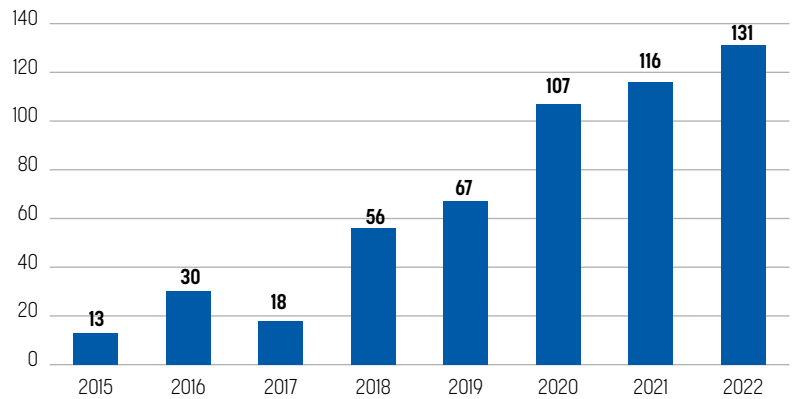
- the mapping of gratification hotspots in each unit,
- information dissemination to officers and customers/stakeholders,
- measuring the effectiveness of gratification control,
- encouraging employees to report gifts received on religious holidays and other major holidays (Eid al fitr, Christmas, and New Year's Eve),
- participating in activities organized on the United Nations International Anti-Corruption Day.

By 2023, the units were also handling complex tasks such as analysing gratification reports and coaching officials.

**Impact**

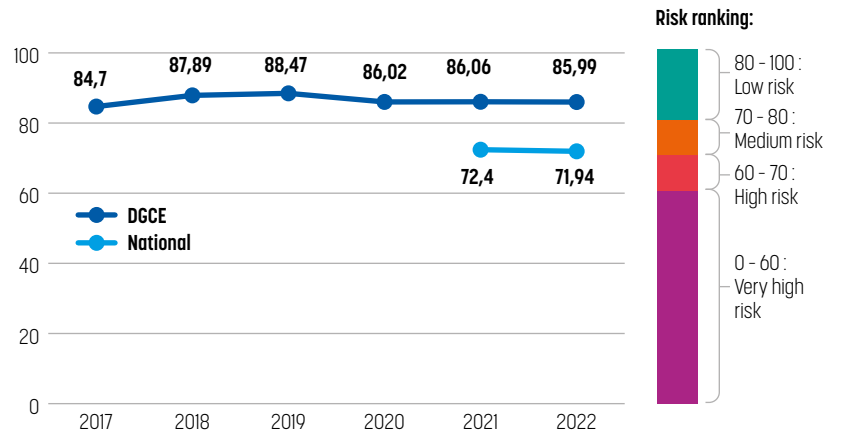
One of the ways of measuring the impact of the units on the level of compliance with the rules on gratification is to look at the evolution in the number of voluntary gratification reports received from Customs officers, as shown in Graph 1.

**Graph 1 - Number of voluntary gratification reports 2015-2022**



Source: Directorate of Internal Compliance, DGCE

**Graph 2 - Integrity Perception Survey Results**



Source: Directorate of Internal Compliance, DGCE

The increase in the number of reports testifies not only to an increased awareness among staff of what constitutes gratification, but also to increased trust among employees in the organization and its commitment towards integrity. This is important as surveys have shown that the perception of corruption leads to corruption.

At the organization level, analysis of the gratification reports has enabled the DGCE to identify risky business processes and services, and to collect vital information on the behaviours and practices of both Customs officers and trade operators. Establishment of the units has also enhanced its reputation. Customs staff and stakeholders interviewed by the Corruption Eradication Commission as part of the annual Integrity Perception Survey have given the organization a low risk ranking since 2017.

**Lessons learnt**

The DGCE believes that, in order to be efficient, corruption prevention must be organized around



three lines of defence: first staff managers, second internal compliance and gratification control units, and third the unit coordinating controls in the Inspectorate General of the Ministry of Finance.

The heads or managers working across the administration must become role models and urge their staff to follow anti-corruption guidelines and adopt an integrity culture. The specialized units must coordinate and collaborate with the Corruption Eradication Commission to continuously coach and educate officials about an anti-corruption culture. Finally, the unit at highest level of the system must monitor every aspect of gratification control-related work, from the identification of hotspots, to investigation and measuring the performance of the system as a whole.

### Challenges and way forward

Gratification control units face various challenges. The first is to change officers' perception of

gratification and voluntary gratification reporting, which is still "taboo" for many of them. The second is to provide officers who report gratification with support and protection when needed. The law does not provide for such measures, although some officers may be faced with retaliation from the individuals involved. Finally, there is a lack of dedicated facilities and infrastructure, for example, rooms in which to store goods given as gifts regarded as gratification.

After seven years of implementation, it is important that the units keep up the momentum and step up their efforts. They will in future also be focusing on reaching out to Customs clients to prevent illicit acts from their side. This will hopefully encourage officers to "speak up" and report integrity violation without the fear of repercussions or pressure.

### More information

[tuditki@gmail.com](mailto:tuditki@gmail.com)



# SMART!

I CLEAR

I CENTRALISE

I OPTIMISE

I SECURE...



[www.conex.net](http://www.conex.net)

CUSTOMS & SECURITY  
SOFTWARE SOLUTIONS

**CONEX**  
i-WAY TO CUSTOMS

# Finnish Customs experiments with the carbon footprint calculator

By Mikael Hyövälti, Innovation Expert, Finnish Customs

A host of Finns imported goods from outside the European Union (EU) in 2022 for their private use. Of these individuals, 250,000 used the Customs Duty Calculator<sup>1</sup> when planning the cost of importing goods. Planning with the Duty Calculator is an effective way of understanding the costs arising from value added tax (VAT) and Customs duties. Customers are also informed of how they will get their imported packages when they arrive across the border.

Finnish Customs is currently experimenting with a new tool to bring additional value for customers who use the Duty Calculator. The tool being tested provides carbon footprint information

about the import logistics by air and sea, and is simply called the “Carbon Calculator”. The objective of the experiment is to assess the extent of customer interest in the footprint of logistics, on top of the current cost information about VAT and duties. As more and more people become interested in climate change, it is highly likely that the carbon footprint data on logistics will be well received.

The idea of the Carbon Calculator came from one of our Customs officers from the IT department. At first, the team was assessing the possibility of calculating the carbon footprint of goods. It was noted quite quickly that the footprint varied a

<sup>1</sup> See “Finland develops user-friendly duty calculator”, WCO News 89, June 2019. <https://mag.wcoomd.org/magazine/wco-news-89/finland-develops-user-friendly-duty-calculator>



lot between different companies, materials and production processes. The more the team found out about the complexities involved, the more this option seemed to offer worse, less accurate results. The path forward consisted of narrowing the area of interest to logistics emissions, as that is also a vital part of receiving goods when shopping online.

At the time, Finnish Customs was implementing a strategy that included a component for pilot projects. The budget for pilot projects made it possible to start cooperation with VTT, one of Europe's leading research institutions. VTT already had experience in the area of carbon footprints and had many ideas for the tool. The list of the most important countries of origin was supplied by Finnish Customs, while the research institution provided a calculation method for the carbon emissions generated by transport via ships and aircraft. Working with the research institution was a great experience, ensuring that the method was accurate and that we were thinking along the right lines.

The point of the Duty Calculator is to make the journey of goods from outside the EU ordered by private persons predictable in terms of price. The calculator also includes information about the arrival of the goods purchased online. The customer has to complete some steps in order to obtain the VAT and Customs duties calculation. First, the customer fills in the country of origin. Next, details of the goods are required, including currency, price of the goods, transport and handling costs, and the specific products. After these steps, the calculation is ready.

No further information is needed for the carbon footprint calculation. We use the information of the country of origin as a starting point. Our team has calculated the averages of the distances covered by goods coming from specific countries outside the EU. For example, if a product is ordered from the United States, the calculator uses the average distance from the most used airports and marine ports in that country to the most used airports and ports in Finland.

As means of transport are fully loaded with packages, one package amounts to only a fraction of the emissions they generate. We therefore also needed to estimate the average weight of a package. We have used the average of 500 grams per package in the calculations, as that happens to be the average size of packages shipped to Finland from outside the EU.

The team also kept in mind that the emission information should be easy to digest. Most often, the carbon footprint is a number such as 10 CO<sub>2</sub>e kg / package. Our team decided to go a step further and thought about examples that would shed some light on the number. We brainstormed multiple ways of communicating the result to the user, for example, presenting the results with a corresponding amount of plastic bags or washes in a washing machine. Everyday examples are a tangible and excellent way to communicate the effects of a good's carbon footprint.

So how does our team know whether the temporary carbon footprint calculator being piloted should have a sequel in the future? During the planning stage, we decided that tracking user statistics was a good way to measure customers' level of interest. We are also going to collect user experience data and analyse the results during the pilot. Even if it is decided that the experiment should not have a sequel, conducting experiments is always successful, as gaining insights and learning continuously is the key benefit.

We hope that many customers will find and use the carbon calculation tool. At the same time, this is only one of the experiments that we are currently undertaking, and many more will come in the future. Through our strategy, we are creating new capabilities for fast and iterative small projects that pave the way for a more agile organization. In this world of change, an adaptive and insightful organization is always one step ahead.

#### **More information**

<https://tulli.fi/en/customs-duty-calculator>

---

*The objective of the experiment is to assess the extent of customer interest in the footprint of logistics, on top of the current cost information about VAT and duties. As more and more people become interested in climate change, it is highly likely that the carbon footprint data on logistics will be well received.*

---



# How India Customs contributes to data-informed decision-making

By Brij Bhushan Gupta, Additional Director General, India

“In God we trust, all others must bring data”. Widely attributed to statistician and management theorist W. Edwards Deming, this quote epitomizes the importance of data in decision-making. With technologies for extracting, collecting, storing and processing data having progressed rapidly over the last couple of years, this statement is truer now than ever before.

This does not mean that knowledge and information acquired through human interaction, scenario building and experience are not important when analysing a situation. Rather, data enhances our cognitive abilities and at times provides a counterview for challenging or validating an initial judgement, as the case may be. The end result, all other things being equal, is a better outcome.

India Customs has taken various steps to leverage data, with some noticeable success. Being a large administration acting over a large territory, India Customs has adopted a two-level data analytics model. The first level consists of a team of highly-skilled officers who run the Advanced Analytics in Indirect Taxes (ADVAIT) programme at the Customs central office. The second level consists of teams located at regional offices, who bring specific knowledge and know-how on some

issues. Below are some examples of how data is collected and analysed to inform decisions.

## Conducting Time Release Studies to drive and assess changes

The WCO Time Release Study (TRS) is an internationally-accepted strategic tool for measuring the actual time taken for the release and/or clearance of goods – from the time of arrival until the physical release of the cargo – as well as the effectiveness and efficiency of border procedures relating to imports, exports and transit movements of goods. Moreover, TRS is considered to be a useful instrument when undertaking a comprehensive assessment of trade facilitation needs and priorities, as well as for the periodic monitoring and measurement of the outcomes of implementing specific measures and associated policies and programmes. A Time Release Study should be carried out regularly, and its results published in the public domain.

It is worth pointing out that TRS data and results are more reliable for assessing and making judgments on the performance of cargo clearance processes than other international performance indicators or indexes developed by institutions such as the Organization for Economic Co-operation and Development or

the World Bank, where the data is gathered by means of a questionnaire. In a paper titled “Measuring trade facilitation: evidence from India”,<sup>1</sup> Customs officers Vijay Singh Chauhan and Sruti Vijayakumar compared the various indicators available in the public domain; they concluded that data on cargo release time was more robust and meaningful than survey-based data for measuring the performance of border management agencies and practices.

India Customs uses statistics generated by TRS to improve processes, inform policy changes and drive discussions with trade stakeholders. For example, one TRS showed that traders were taking rather a long time to pay for the discharge of goods, thereby decreasing the efficiency of the ports. It was therefore decided to add interest after allowing a given amount of time for such payments, to nudge importers and brokers to accelerate the process. Similarly, changes made to promote the advance filing of bills of entry and AEO certification were backed by TRS data. The insights generated by the aforementioned TRS also led to the removal of certain processes which, over time, had become redundant or could be automated thanks to technology. The impact of all those policy interventions was in turn assessed in subsequent TRS.

The WCO strongly advocates that Customs administrations conduct a TRS in close collaboration with other relevant government agencies and private sector stakeholders. India Customs is gradually expanding its TRS by collecting data generated not only by Customs systems but also by logistics partners, port authorities and partner government agencies.

### **Mapping economic activity for targeted State intervention**

Analysing import and export data enables governments to monitor levels of economic activity and identify the need for economic intervention or the development of infrastructures. In India, the mapping of export volumes according to districts<sup>2</sup> has enabled policy makers to identify areas where measures to boost manufacturing and promote exports are needed. The mapping has also provided valuable inputs for optimizing transportation and warehousing costs.

### **Analysing item descriptions to identify Valuation anomalies**

Products sharing the same HS code can have various Customs values, depending on their characteristics and specifications. One way to group them and uncover valuation anomalies is to analyse the description of each item provided in the Goods declaration. India Customs is using text mining algorithms (particularly Text Clustering) to do this. The first step was to create clusters according to historical data. A software then compares the text of the description to the text in each cluster and determines which one offers the closest match. The value of goods in the same cluster is then compared.

### **Providing data on the usage of preference treatments established by Free Trade Agreements**

Trade negotiators need Customs data both when considering the signing of a Free Trade Agreement (FTA) and when evaluating the effectiveness of FTA commitments and the benefits they have brought for business. India Customs therefore analyses trends in imports for which preference treatment has been claimed, and looks at the factors which hinder the effective utilization of FTAs.

### **Classifying and analysing queries, to identify the areas where clarifications are more frequently sought, and the types of traders who are having difficulties in complying with the regulations**

A Customs query is a request for information made by a Customs officer to a trade operator, during an import or export operation. Such queries are communicated by entering unstructured text in the Customs automated system, and the trader is expected to respond via the same system. It is sometimes necessary for a query to be tossed back and forth in order to solve an issue. A tool called “Query Classifier” has been developed to generate data on the types of queries issued by period, port of entry, frequency of interactions, type of clarification sought, type of trader involved, etc.

Actionable insights can be derived from this data. For example, having identified areas where clarifications are sought more frequently, Customs

---

*Customs officers Vijay Singh Chauhan and Sruti Vijayakumar concluded that data on cargo release time was more robust and meaningful than survey-based data for measuring the performance of border management agencies and practices.*

---

<sup>1</sup> [https://carnegieendowment.org/files/Chauhan\\_Vijayakumar\\_India\\_Measuring\\_Trade\\_FINAL.pdf](https://carnegieendowment.org/files/Chauhan_Vijayakumar_India_Measuring_Trade_FINAL.pdf)

<sup>2</sup> A district is an administrative division of a state or territory in India

can offer targeted training to its staff and improve consistency in decision-making. It can also improve the compliance of trade stakeholders by providing training on processes and procedures which do not appear to be well understood. Also, an issue which crops up repeatedly may reveal the need for a policy intervention.

### **Revenue forecasting**

Customs has developed models for forecasting revenue from Customs and Goods and Services Tax (GST). There are three types of forecasting: monthly, quarterly and annual. The annual revenue forecast is updated regularly.

### **Predicting fraud by analysing applications for GST registration**

GST is a value-added tax levied on goods and services sold for domestic consumption. It is paid by consumers, but is remitted to the government by the businesses that sell the goods and services. These businesses must register online. As those likely to commit fraud on GST are also likely to commit fraud when importing or exporting goods, an application has been developed to identify entities whose behaviour has been deemed suspicious when they apply for registration and on GST enforcement officer reports. The tool uses machine learning technology and is similar to those used to assess risk in connection with credit card applications.

### **Managing staff**

Internal administrative processes also generate large amounts of data which can be mined. With a large workforce of more than 45 000 officers, India Customs has attempted to use data to guide

human resources planning, manage vacancies, organize job rotations based on profiles and job requirements, grant promotions, and plan training and capacity building activities.

### **Building capacities across the administration, starting with its leaders**

Often, Customs administrations have a handful of officers with a background in data science who form “islands of excellence” in data analysis. But this is not enough. Knowledge about data must be better shared across the organization, and a multi-layered approach needs to be adopted for this purpose. The starting point is to gain an understanding of officers’ behaviour towards data and analytics and provide tailored training that takes their abilities into account. India Customs has also organized bootcamps to train data masters and create a pool of trainers able to transmit their knowledge and skills to a larger set of people. It also organizes annual hackathons; these are events where teams (including developers, but sometimes designers and project managers too) collaborate on a computer project – usually the development of application software. Identified solutions are scaled up across the organization.

Most importantly, the drive towards data-driven decision-making in India Customs is being championed and promoted by its leadership, who demand data-based evidence when taking any managerial or policy decisions and lend their support to all sound, data-related initiatives.

### **More information**

[indiawco-cbec@nic.in](mailto:indiawco-cbec@nic.in)

# Turkish Customs response to earthquakes

By Turkish Customs

The devastating earthquakes that hit the south-east of Türkiye on 6 February 2023 destroyed 13 cities, directly affecting approximately 16 million people. Immediately, a fourth-level state of alert was declared, triggering a call for international help. Around 7,800 humanitarian aid shipments from 120 different countries were sent in the three months that followed the earthquakes, as well as rescue teams, dogs and equipment. This article looks at how Turkish Customs facilitated the movements of goods and people, and the main challenges it faced.

## National Disaster Response Plan

In Türkiye, the Disaster and Emergency Management Authority (AFAD) is the institution working to prevent disasters and minimize disaster-related damage, plan and coordinate the post-disaster response, and promote cooperation among various government agencies. Affiliated to the Ministry of Interior, it developed a National Disaster Response Plan, together with relevant national institutions, including the Ministry of Trade and its Customs Service. Turkish Customs therefore attended meetings on the Plan's implementation in order to determine the measures to be taken in line with pre-disaster/post-disaster scenarios. Many practical questions were addressed, such as how to work on a 24/7 basis, who the contact persons would be, which institutions to communicate with, and the fastest and easiest transport options. Turkish Customs also participated in activities organized at the international and regional level on disaster management, including table-top exercises in which teams discussed their roles and responses during an emergency, walking through example scenarios.

The National Disaster Response Plan establishes a Disaster International Support and Cooperation Group, which is primarily responsible for



© Turkish Customs

coordinating the distribution of aid to disaster victims. Within this Group, Turkish Customs' role is to ensure fast clearance of international aid and direct it to the region of need, in coordination with other institutions. It must also ensure that there is communication with relief stakeholders at home and abroad so that they all understand what is considered to be relief goods and the related Customs processes.

### Customs regulations

In Türkiye, the import regulations provide that, in crisis situations, a bill of lading or packing list is required for relief items and these documents must include specific information on the goods (type, description, quantity, weight, vehicle licence plate, and name of the ship, or flight number). Importers can also make an oral declaration.

Immediately after the earthquakes, the list of goods granted the status of relief goods, as well as their import requirements, were communicated through many media, both in English and Turkish. The list of State institutions, organizations and associations working for the public interest that could receive relief goods and were granted tax exemptions was also published. All this information was provided by Turkish representations abroad in local languages as well.

Therefore, although Türkiye has not ratified Specific Annex J to the revised International Convention on the Simplification and Harmonization of Customs Procedures (RKC), which invites States to authorize "lodging of a simplified Goods declaration or of a provisional or incomplete Goods declaration subject to completion of the declaration within a specified period", its national Customs regulations facilitate the declaration process.

All staff, especially the Customs personnel in the earthquake areas, worked hard to ensure that procedures were completed and humanitarian aid could be cleared as soon as possible without any disruption in transport. Turkish Customs staff in charge of clearance worked on a 24/7 basis in order to complete and facilitate the Customs clearance of relief consignments. Other personnel, such as experts from the exemptions department, were required to adopt flexible hours to assist whenever needed.

Controls on trade policy compliance, such as origin of goods, were not conducted on relief shipments.

Moreover, regulatory border agencies agreed that inspection of goods under their remit would be simplified by suspending sampling and analysis activities. Examination of the goods was carried out by the personnel of the relevant institution at the Customs office, and the goods were sent right away to the zones affected by the earthquakes.

Information about the importation of crucial goods, such as prefabricated houses, containers, tents and food, was collected in advance by the Ministry of Foreign Affairs thanks to the communication channels established with national and international organizations. The information was then sent to the relevant Customs office. If there was no Customs office at the place where the relief goods were to arrive, mobile Customs teams were sent to complete the Customs procedures.

Annex B9 to the Convention on Temporary Admission (Istanbul Convention) stipulates that temporary admission can be granted without a Customs document or security being required, but that the Customs authorities may ask for a simple inventory of the goods, together with an undertaking to re-export them. Türkiye has accepted the Annex, and its provisions were applied to the temporary admission of certain goods like tents, prefabricated houses, blankets, and vehicles, as well as medical and laboratory equipment, provided that the consignee of the goods was in the list published by the government.

Particular attention was paid to the importation of goods such as medical and surgical equipment which are subject to specific regulations and to the control of another national authority. Such goods were not delivered to any person or institution other than hospitals or health institutions. Similarly, medicines, medical consumables and medical goods brought in by doctors and health workers were allowed only if the list of goods was submitted to the Customs administration, and the simplified Customs procedures completed.

### Challenges

Although information on the import rules for relief goods was released immediately after the earthquakes, many individuals living abroad sent consignments to their friends and relatives. This created additional work for Turkish Customs staff. Whilst officers adjusted their working time to ensure a 24/7 service in the first few days, they found it more and more difficult to maintain this

---

***Turkish Customs staff in charge of clearance worked on a 24/7 basis in order to complete and facilitate the Customs clearance of relief consignments. Other personnel, such as experts from the exemptions department, were required to adopt flexible hours to assist whenever needed.***

---



work pace as time went on. Staff working long hours on a given day were therefore asked to rest the following day.

Another challenge related to the clearance of shipments of medicines. Early on, discussions were held with the Ministry of Health, which carries out the compliance inspection of pharmaceutical products, on how to deal with the usual length of the inspection process and with the fact that the labelling and technical documentation of products would not be compliant with national translation requirements. As there was no issue in terms of stocks in the country for the goods concerned, it was decided to exclude medicines from the list of relief goods until otherwise advised by the Ministry of Health. Medicines and medical consumables were allowed only if brought in by the doctors of a rescue team, or sent to a

health institution or a hospital. The decision created delays with the clearance of some mixed shipments which included medicines.

Conducting controls was also complex sometimes. Turkish Customs strove to facilitate Customs procedures due to the emergency faced, but also had to apply trade policy measures to certain goods. Some goods deemed as high risk and requiring further controls, as well as items that were not recognized as relief goods, were sometimes included in shipments declared as relief. Customs therefore had to be vigilant, and identify and separate goods in the same shipment.

#### More information

Twitter: @GumruklerGM

Instagram: gumruklergenel mudurlugu

[www.trade.gov.tr](http://www.trade.gov.tr)

# PARCOURS

## certifiants

Our training "PARCOURS" meet your goals :

- ✓ Customs Competency-Based Training (in accordance with the UCC)
- ✓ In partnership with the French Customs
- ✓ Recognized by the European Commission

Scan for info



**CUSTOMS IS A SUPER POWER !**

# Focus: Developing leadership and management skills



# Testimony of a facilitator

By Arno Kooij, Director of Enforcement and International Affairs, Netherlands Customs

Sunday morning, Christmas Day 2022. It is around 11 a.m. and my phone beeps. A message from Naomi, wishing me a Merry Christmas, just like every year since 2014. Warm memories come back to my mind as I reply to her with my Christmas wishes for her and her loved ones.

I met Naomi in 2013 at a Leadership and Management (LMD) workshop in Mauritius, organized by the WCO Secretariat. I had just been accredited as an LMD expert and this was the first workshop which I facilitated. Since then, I have been supporting 14 more LMD Programme activities and have been able to experience and witness first-hand their impact on an organization, and on the men and women who work for it and for the safety and prosperity of their country and of the global Customs community. The activities carried out under the LMD Programme are transformative.

I have seen how the Top Executive Retreat (TER), an activity offered to Directors General and their top executive teams, can enable senior management to strategically lead organizational change, while managing competing priorities on a daily basis. Participants are guided so that they better understand themselves and grow as people and as managers to better lead their teams or their organizations. Senior managers and the senior management teams look at how to think and act more strategically, learn to listen to one another, and empower their teams by delegating decision-making powers to the extent possible, that is, to the level where the knowledge and know-how lies.

Let's go back to Mauritius and to Naomi. She was quiet in the first few days of the LMD workshop, and she seemed somewhat uncomfortable in the group. She never took the floor on her own initiative. When she was invited to do so, she was gentle and soft-spoken. But her remarks were spot-on. We all discovered that Naomi was a great listener and that she was able to easily take the conversation to a deeper level. We praised her for that and you could see that her confidence was growing. As the days went on, Naomi's colleagues actively started to ask for



her opinion. It was impressive to see her grow during the two weeks that the workshop lasted. At the closing ceremony, Naomi spoke about the glass ceiling for the women in the organization and what she would do to change it. We were all deeply touched.

In 2022, I had the opportunity to facilitate a TER for the Philippines Bureau of Customs. The Commissioner, a very strong leader, was about to leave the organization. The WCO Secretariat team and the experts had discussed whether to organize the retreat or not. If the Commissioner was leaving, what was the point? After some deliberation, we realized that it should actually be the other way around : we should go *because* the Commissioner was leaving, in order to ensure that the team was able to keep up the momentum. Once there, we found a team that was worried that all the progress that the Bureau had made over the years would disappear upon the arrival of a new Commissioner. In response to their worries, we conducted some exercises to enable them to appreciate their own leadership qualities and to realize how strong they could be as a team. Together, they could keep the ship sailing steady during the transition of power. At the end of the workshop, we even organized

a role-play during which they had to brief the new Commissioner, explaining the strategic goals of the organization, their priorities and the position of the various stakeholders involved. We invited them to come up with a plan for the transition of power and to identify possible quick wins to the new Commissioner. It was inspiring to see how they applied what they had learned with us while doing so.

We followed a similar approach recently in Nigeria, where the leadership team is preparing for the departure of its Comptroller-General, who has led the Nigeria Customs Service (NCS) for a long time. The team focused on flagship projects, such as the conduct of a Time Release Study and the launch of a trade facilitation programme called “Fast Track 2.0” (FT 2.0), which aims to enable compliant importers and agents to clear their cargoes within 24 hours.

The senior Customs management team of the South African Revenue Service (SARS) was also facing some challenges and leadership was clearly recognized as a key enabler for effective implementation of SARS’ reconstruction. Our objective with the TER was to increase the leadership capacity on an individual level and to strengthen the management team. From early morning till late at night, the team worked hard. Among other things, they shared their views on the challenges in achieving the goals of the organization, discussed the qualities of each team member, and identified priority projects to focus on as a team.

To conclude, let me get back to Naomi once more. She managed to break the glass ceiling in her organization and now occupies a senior management position. She might have been able to do so without participating in the LMD workshop, but, like many other participants, including facilitators, she says it has transformed her.

It is difficult to assess the impact of LMD activities, especially in the long term. We could count the transition documents and action plans created, but how do you capture an increase in leadership capacity and new team dynamics? I believe this is something Customs administrations which have participated in an LMD Programme activity should work on together, under the WCO umbrella.

#### More information

[abw.kooij@douane.nl](mailto:abw.kooij@douane.nl)



### About the WCO Leadership and Management Development Programme (LMDP)

#### Three types of activity

- the Top Executive Retreat (TER), which is aimed at strengthening the capacity of Directors General and their top executive teams to lead and drive reform and modernization agendas;
- the LMD Workshop, which aims at providing senior and promising middle-level Customs Managers with a better understanding of modern management approaches and their own personal leadership attitude and behaviour, based on improved self-knowledge and self-awareness;
- the Middle Management Development (MMD) Training, which aims at equipping middle managers with a set of fundamental management competencies and skills.

#### E-learning module on the CLiK! platform

A module on *Leadership and Management Development* is available in English, French, Spanish, Russian and Arabic.





# SARS partners with the WCO to strengthen leadership and management skills

By Edward Chr Kieswetter, Commissioner, South African Revenue Service (SARS)

In 2019, after being weakened to a point which compromised its efficiency, the South African Revenue Service (SARS) started rebuilding itself. Developing leadership skills was seen as integral to this process. This article explains how SARS has prioritized leadership and worked with the WCO Secretariat to equip staff with the skills and mindsets to make things happen and move forward.

## From state capture to a smart modern SARS

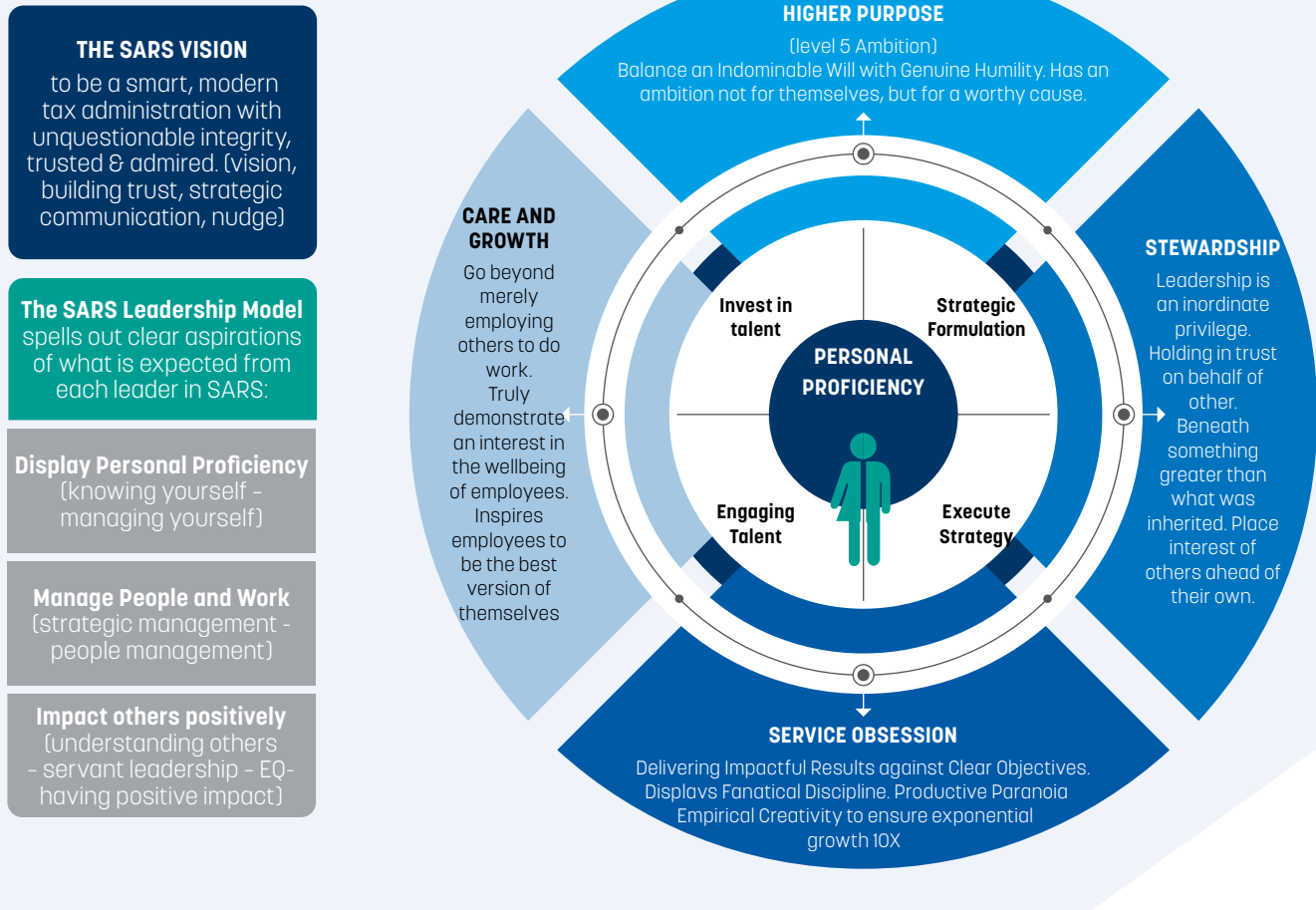
In South Africa, "state capture" has become a buzzword, shorthand for the many scandals that plagued the Jacob Zuma administration and eventually brought it down. State capture describes a form of corruption in which businesses and politicians conspire to influence a country's decision-making process to advance their own interests.

SARS is one of many state institutions said to have been "captured" in this fashion. In addition, a special commission established to investigate internal governance at the agency found massive

failures of governance. "SARS was systemically and deliberately weakened, chiefly through the restructuring of its institutional capacity, strategic appointments and dismissals of key individuals, and a pervasive culture of fear and bullying. It is a clear example of state capture", can be read in the report by the commission set up in 2018 to investigate corruption allegations during Zuma's time in office.

In 2019, after my appointment as Commissioner, the rebuilding of SARS commenced in earnest, focusing on restoring governance and integrity, as well as the capability to effectively collect revenue, improve compliance and facilitate

## Alignment of the SARS leadership system & WCO leadership philosophy



legitimate trade. SARS' latest Strategic Plan<sup>1</sup> set the ambition to build “a smart modern SARS, with unquestionable integrity, trusted and admired”. Leadership development was a fundamental priority in this regard.

### SARS Leadership Model and WCO partnership

I was appointed Commissioner of SARS on 1 May 2019 and it was clear for my team and me that developing leadership skills among staff was to be integral to the work of rebuilding SARS. At the core of every successful administration are executives who are adaptable, innovative and open to growth and change. A team was therefore established to develop a customized SARS Leadership Model which sets out the competencies and attributes that staff should exemplify. Each of the required attributes is described in the Model, along with behaviours that would enable, as well as those that would derail, leadership competence.

Under the Model, the executive team has the explicit accountability to serve as role models and instil leadership attributes in middle and operations managers. Together, they are the conduits of positive employee engagement which is central to any organization. Engaged employees are net promoters of their organizations, as they work harder, stay longer and motivate others to do the same. This ultimately yields service excellence for taxpayers and trade operators.

When I looked into the WCO Leadership and Management Development (LMD) Programme, I realized it was closely aligned to the SARS Leadership Model, and that working with the WCO Secretariat would assist SARS in accelerating the development of leadership and management competencies across all levels. Thanks to the partnership with the WCO Accelerate Trade Facilitation Programme, which is funded by the United Kingdom's His Majesty's Revenue & Customs (HMRC), both organizations started working together to identify needs and

1 <https://www.sars.gov.za/wp-content/uploads/Enterprise/Strat/SARS-Strat-24-SARS-Strategic-Plan-2020-2021-2024-2025-11-May-2020.pdf>

### THE WCO LEADERSHIP AND MANAGEMENT PHILOSOPHY

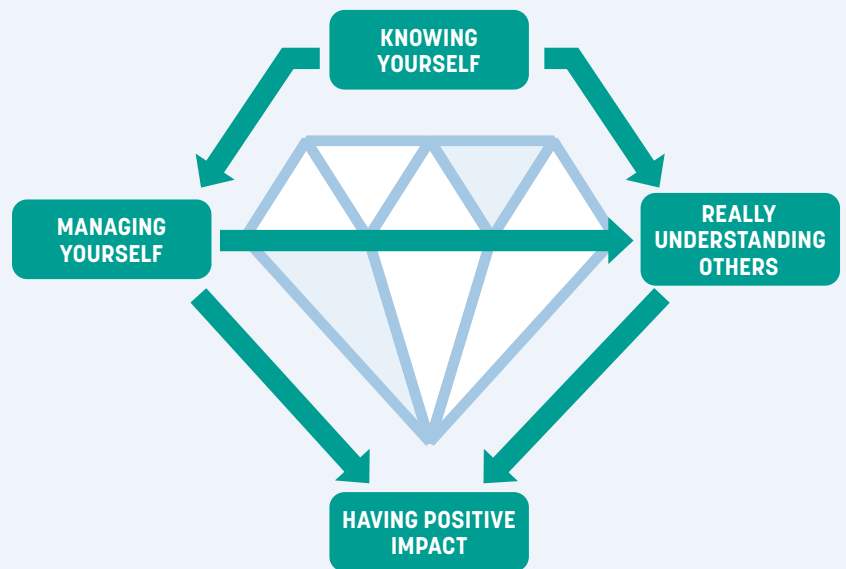
is that modern leadership and management (i.e., leadership and influencing others) starts with knowledge and understanding of self (Personal Proficiency).

The philosophy of Leadership is premised on a conviction that:

Leadership and influencing others start with **knowing yourself**. Only then can you manage yourself

Both knowing yourself and managing yourself are the prerequisites for really **understanding others**

Having a **positive vision** and personal mission, in addition to all this, creates a foundation for leadership



how best to respond to them as part of a multi-year strategic partnership for effective trade facilitation reforms.

In October 2022, a workshop was organized to strengthen the capacity of the members of the top executive Customs team to lead and drive reform and the modernization agenda. It was followed by an LMD workshop, aimed at providing senior Customs managers with a better understanding of modern management approaches and of their own personal leadership attitudes and behaviours, based on improved self-knowledge and self-awareness.

### Impact

On 3 April 2023, SARS announced the results of its work over the past four years. Encouraging positive trends include:

- A 7% increase in revenue collection;
- Some 12% growth in the number of trade transactions processed;
- Improvement from 62.6% to 63.9% in the voluntary compliance index, which measures the overall compliance behaviour of taxpayers across the compliance value chain (registration, filing, declaration and payment);
- An increase in public trust from 44% (2018/19) to 66% (2022/23), according to the survey conducted by SARS;
- Performance of employees against the service charter has increased from 55% to 80% over two years since 2020/21, according to the survey conducted by SARS;
- An increase from 61.6% to 69.4% since 2019 in the employee engagement index, which monitors the extent to which employees feel valued and involved in their everyday work, and is calculated based on the results of a survey conducted by SARS through an independent company.

While progress has been made, we are a long way before we can declare victory. Using the “inches are everywhere” analogy, we know only too well that there are still substantial inches that remain untouched. The results we celebrated were not obtained from doing “one big thing”, but from the collective effort of our 12,500 colleagues. We are literally harvesting millions of “inches to win” that are “everywhere”.

As part of this endeavour, during their LMD workshop the top executive-level team of Customs discussed how to work towards effective implementation of reforms, support the adoption of the SARS Leadership Model and further instil a new management culture within the organization. They were tasked with integrating what they had learned during the workshop into four priority initiatives, namely:



© SARS

---

*While progress has been made, we are a long way before we can declare victory. Using the “inches are everywhere” analogy, we know only too well that there are still substantial inches that remain untouched. The results we celebrated were not obtained from doing “one big thing”, but from the collective effort of our 12,500 colleagues. We are literally harvesting millions of “inches to win” that are “everywhere”.*

---

- Creating SMART borders by leveraging data and technology to create a seamless experience for legitimate traders and travellers at ports of entry, while enhancing our detection capabilities to respond to any risks;
- Promoting the Accredited Economic Operator (AEO) programme designed to facilitate trade by providing a “green lane” experience to accredited operators;
- Implementing a Single Window;
- Implementing Advance Import Payment (APN) Notification, part of the APN project that aims to bring together data from SARS, Authorized Dealers, and the South African Reserve Bank to increase regulatory controls relating to advance foreign exchange payments in order to prevent illicit financial flows and combat associated Customs valuation fraud.

### Testimonies

Here I will let some of the top executives and senior officers who participated in the WCO LMD workshops speak for themselves, starting with Beyers Theron, Director of the Customs Department of SARS: “WCO experts created an environment conducive to mature and progressive dialogue. Whilst I think we have a journey through which we still have to grow as a team, there is an increased level of trust among us. There is also a renewed spirit of openness and commonality of the strategic actions to be taken.” He also highlighted that, since the workshop, there has

been good progress in prioritizing modernization projects and scoping phases: “The workshop has created a sense of urgency. We realized we needed support so we could really serve a higher purpose and demonstrate stewardship, by displaying an obsession with service and applying care and growth.”

Memory Ndou declared: “The workshop has re-energized my personal proficiency, which assisted me to approach leadership differently, manage people better and do things differently, resulting in a positive impact on myself and the team. There was a quick mindset change professionally, which I am gradually instilling in my team to enable them to understand our higher purpose and approach things differently.”

For Tebogo Ntuli, learning about time management tools, as well as techniques on to how to delegate, motivate teams and drive change, were especially useful: “I have become much more disciplined and continuously try to improve my actions and attitudes. Thanks to the presentations on the SARS and WCO leadership models, I better understand my role as a leader and am passionate about transmitting what I have learned to my team.”

Barbara van Dyk said: “Leaders inspire hope when they tell a powerful story of compelling vision and strategic clarity; employees follow when they see themselves in the story as it becomes their story.” More than ever, she strives to give her best to those she leads in order to make a difference.





© SARS

## Way forward

To ensure continuous learning and measurement of leadership effectiveness and pragmatic application, the following has been initiated following the LMD for the Customs top executive team:

- Rolling out a 90-day learning project supervised by the Director of Customs, which includes the development of leadership skills across all SARS levels;
- Institutionalizing a Cadet programme for Customs officers;
- Implementing a competency-based Customs career progression model, and upskilling the existing Customs staff;
- Assisting executives in developing personal growth plans aligned to the SARS Leadership Model;
- Proposing coaching sessions;
- Organizing Coach-the-Coach training to give senior managers the confidence and skills to overcome common coaching challenges;
- Conducting a 360-degree leadership assessment, a form of feedback for leaders in which their skills, effectiveness and influence as an executive, leader or manager are evaluated.

Moreover, SARS will continue further embedding its Leadership Model in Customs and Excise and will be rolling out WCO Middle Management Development (MMD) to equip middle managers with a set of fundamental management competencies and skills.

## Conclusion

There are many leadership development training programmes proposed by consultancies and universities. While experts might argue that the components of leadership are the same for all, such programmes should be customized and based on the organization's context and culture. By working with the WCO Secretariat, SARS has increased its capacity to identify what matters most to the organization when it comes to leadership development, and to equip staff with the right skills. Let me conclude by thanking the UK's HMRC for its continued support and for enabling the SARS-WCO Accelerate Trade Facilitation partnership.

## More information

<https://www.sars.gov.za>

## About the WCO Accelerate Trade Facilitation Programme

This Programme, funded by the United Kingdom's His Majesty's Revenue & Customs (HMRC), supports middle income, developing and least developed countries with effective implementation of the WTO Trade Facilitation Agreement for more predictable, quicker and less costly cross-border trade flows. The Programme was initiated in 2015 and is currently in its fourth funding Phase (2022-2025), supporting 10 countries in Africa and Asia.

Activities under the Programme focus on leadership and management development, competency-based human resource management, gender and inclusivity, and integrity as important building blocks for Customs administrations to manage reforms and operations.

# An overview of Zimbabwe Customs' journey

By Magret Gasu, Training Manager, Human Capital Division, Zimbabwe Revenue Authority

The Zimbabwe Revenue Authority (ZIMRA) Strategy for 2021 to 2025 has people as one of its key pillars, demonstrating the Administration's commitment to investing in staff development. Leadership is one of the topics for which competency building has been sought. In 2022, ZIMRA won the 1st runner-up Award for Distinction in Leadership Development from the Institute of Human Resource Management. This article presents the various activities undertaken by the Administration that led to this recognition.

## The Executive Team

In 2021, new members were appointed to ZIMRA's upper echelons, including the Commissioner General. While all the new members had occupied management positions in the past, it was deemed necessary to ensure that they were all equipped with the knowledge and skills needed to steer the organization towards the objectives and priorities decided upon by the policy-making bodies.

ZIMRA contracted Africa University (the first private university to be recognized by the government in Zimbabwe) as well as a consultancy firm to train the 16 individuals who constituted its Executive Team. The first step was to identify gaps in leadership and management skills through a written survey and face-to-face interviews. The tailored Executive Development Programme which was developed for the Team as a result focused on the following aspects: servant leadership, personal effectiveness, thought leadership, influence, creativity and innovation, decision-making, planning, solution development, opportunity identification and execution.

In addition to these aspects, during the six-month training period participants also worked on actual projects, in teams of three, to enable them to put into practice the methods and concepts they had learned. On 10 March 2022, a graduation ceremony was organized to recognize their commitment and dedication to continuous improvement and learning.

## Senior managers

From 2009 to 2014, thanks to funding from the Australian Agency for International Development (Australia AID), all officers who held senior



The Executive Team during the Development Programme Graduation Ceremony (one team member was unable to attend)

management positions followed a leadership development programme developed by a private company. Those appointed to such positions after 2014 are yet to receive this training. In 2021, two senior managers enrolled in training developed by the Commonwealth Association of Tax Administrators (CATA) Programme, thanks to funding from HM Revenue & Customs.

Two more officers completed this training online in 2022, and another two are currently following it. The next step is to have ZIMRA's 26 senior managers graduate from the Executive Development Programme in the years to come, to ensure that the succession plan (the document which describes key positions in the organization and how they will be passed on to other employees) can be implemented.

ZIMRA has also approached the WCO Secretariat to benefit from a Leadership and Management Development Workshop which is aimed at providing senior and promising middle-level Customs managers with a better understanding of modern management approaches and their own personal leadership attitude and behaviour, based on greater self-knowledge and self-awareness.



## Middle managers

Funding from Australia AID also enabled ZIMRA middle managers to follow modules one and two of the leadership development programme, but this ended in 2014. In April 2022, when the WCO Secretariat started looking for administrations to pilot its Middle Management Development (MMD) Training, ZIMRA jumped at the opportunity. It first had to select potential trainers, who would need to participate in a WCO accreditation workshop before they could deliver the WCO training to their peers. Training its own trainers has enabled ZIMRA to stop outsourcing leadership and management training to consultancy firms, and thus save money.

The Administration started rolling out the MMD Training in July 2022. So far, five training sessions have been conducted across the country, and more are planned. The content was divided into two modules lasting one week each. The objective was to equip middle managers with modern management techniques and skills to manage others with the appropriate behaviour and attitudes in all circumstances, as well as enabling them to know themselves better. As a means of evaluation, middle managers were required to work on a specific task or project while applying what they had learned.

## Supervisors

“Supervisor” is the name given to officers who act as a link between managers and the workforce. Everyone who reaches this grade must follow a Supervisory Management Development Programme (SMDP) during his or her first year of appointment. The Programme is divided into two modules. The first one includes basic courses which are delivered by ZIMRA officers, while the second one includes more advanced courses and is managed by a consultancy firm.

**Table 1: Topics covered in the WCO Middle Management Development Training**

Module 1	Module 2
1. Role of a Manager	1. Influential Communication
2. Differences between a Manager and a Leader	2. Outstanding Customer Service
3. Most Effective Management Styles	3. Negotiation Techniques
4. Emotional Intelligence	4. How to engage stakeholders
5. Decision-Making	5. Project Management
6. Personal Development Plan	6. Strategic Management
7. Team Building	7. Organizational Culture & its importance
8. Coaching by a Manager	8. Time and Stress Management
9. Performance Management	9. Change Management for Middle Managers
9. Staff Resilience	10. Meeting Management
10. Boosting Self-Motivation	11. Integrity
11. Delegation	
12. Multi-cultural Communication	
13. Interpersonal Communication	
14. Difficult Conversations & Conflict Management	

## Conclusion

Customs must prepare future leaders to continue performing effectively. By developing the leadership and management skills of its staff at all levels, ZIMRA intends to identify exceptional and high-potential employees and place them on an accelerated career path, to ensure that managers and leaders who retire or leave the organization can be replaced. As hiring a consultancy firm can be costly and funding for such activities difficult to obtain, the Administration intends to work more closely with the WCO Secretariat in the future.

## More information

[mgasa@zimra.co.zw](mailto:mgasa@zimra.co.zw)

# Open Customs Blockchain: The missing piece to unlocking the broad application of distributed ledger technology for Customs?

By the Open Logistics Foundation

Digitalization has simplified Customs clearance in many areas, especially in the declaration of imports and exports. However, various data discontinuities and queries unnecessarily delay cross-border process flows. A group of major logistics companies, software providers and researchers is driving an initiative which could change this. Called the "Open Customs Blockchain", it focuses on developing and applying blockchain technology for the exchange of key Customs data in foreign trade. The best part: the jointly developed software components will be published publicly under an open-source licence. This article looks at why previous projects and initiatives have not yet achieved the widespread use of blockchain, and what is so different about the open-source approach that just might be the missing piece to unlocking broad and standardized application.

## Why blockchain

Blockchain is a decentralized, distributed, tamper-proof and cooperatively used form of data storage. It is based on distributed ledger technology, similar to an actual cash book in which information is recorded. Several entries are chronologically combined in blocks, which in turn are linked together with the help of a cryptographic "fingerprint", the hash. Hence, this chain of blocks is called a blockchain. By adding so-called "smart contracts", programmed "ifthen" conditions, it is also possible to automate sub-processes, for example, to execute predefined actions.

In blockchain networks, a secure exchange of data is possible even without a central instance, since every network participant has an identical copy of the "cash book", and the correctness of the entries is jointly checked and confirmed by the participants. Applying the technology for the exchange of data between several companies could enable companies and authorities to

interweave the flow of goods and the flow of information in foreign trade more closely and simplify Customs clearance for all parties involved.

The added value of blockchain usage lies in the tamper-proof provision of the relevant data at an early stage in the process and in feeding information on Customs clearance back into the logistics process to make it available to the other players up and downstream of the supply chain. In this way, more transparency – and thus more trust – is created in supply chain networks across borders and, at the same time, paper-based documentation is reduced.

Transparency in this case does not mean that all information is accessible to everyone without exception. A targeted role and rights concept enables data access according to the needs of each participant.

In the long term, there are greater opportunities from the integration of Customs authorities.



By integrating national Customs offices into corresponding blockchain networks, it will be possible to access a reliable and up-to-date source of information at all times, for declarations, clearance, and also for the subsequent inspection of imports and exports. Companies and authorities could benefit from a reduced number of contacts as Customs brokers and Customs officials at home and abroad would be able to trace information on import and export processes at any time and without any doubt.

### Goods Passport ID, a set of essential information

Currently there are many proposed solutions worldwide that require multiple parties to agree to large and complex data sets. However, the coordination processes for this are very cumbersome and once an agreement has been reached, the technical implementation is often just as complex. Moreover, the volume of data collected by authorities and entered by economic operators may be larger than would actually be necessary for the process handling. In a paper by researchers from the University of Surrey on a United Kingdom (UK) Government project that sought to identify if using blockchain technology could reduce friction at borders,<sup>1</sup> the UK Customs authority (HMRC) stated “we will only need to check key data fields”.

Because of this, when designing the Open Customs Blockchain, we decided to focus instead on a set of essential information that authorities

see as being the main source of fraud and duty evasion. We named this key data set “Goods Passport ID” or “GPID”. It contains data that is required at various steps along an export/import process and that is needed repeatedly by multiple stakeholders (e. g. Customs authorities, forwarders, buyers and sellers): basic information on the seller, the buyer, the invoice (value, quantity), origin and classification of the goods traded. This is the data that authorities normally focus on to detect fraud and duty evasion (see Figure 1).

The Goods Passport ID is the blockchain identification number for the “key data set” of a given invoice. Via the GPID, the corresponding key data set can be found and accessed on the blockchain.

How many GPIDs are there in a process? There is one GPID per invoice and one invoice per GPID. Once a GPID has been created for one specific invoice, this invoice cannot be submitted to the blockchain again by creating a different GPID.

Can the GPID be manipulated? No. Once a GPID has been created for one specific invoice, this identifier cannot be changed.

Can the key data set be amended? Yes. It is possible to add or edit certain (but not all) entries of an already existing key data set. The changes made and the authorship of those changes are logged on the blockchain in a change history.

*This project brings together the most diverse actors in Customs processes: declarant, seller, buyer, Customs service provider, carrier, Customs authorities ... and even across countries.*

*This creates a binding, common data truth.*

*It will enable our customers to organize their Customs processes in a completely new way with the goal of higher automation, data quality and transparency.*

Dr. Ulrich Lison, AEB SE

Figure 1: Key data set overview

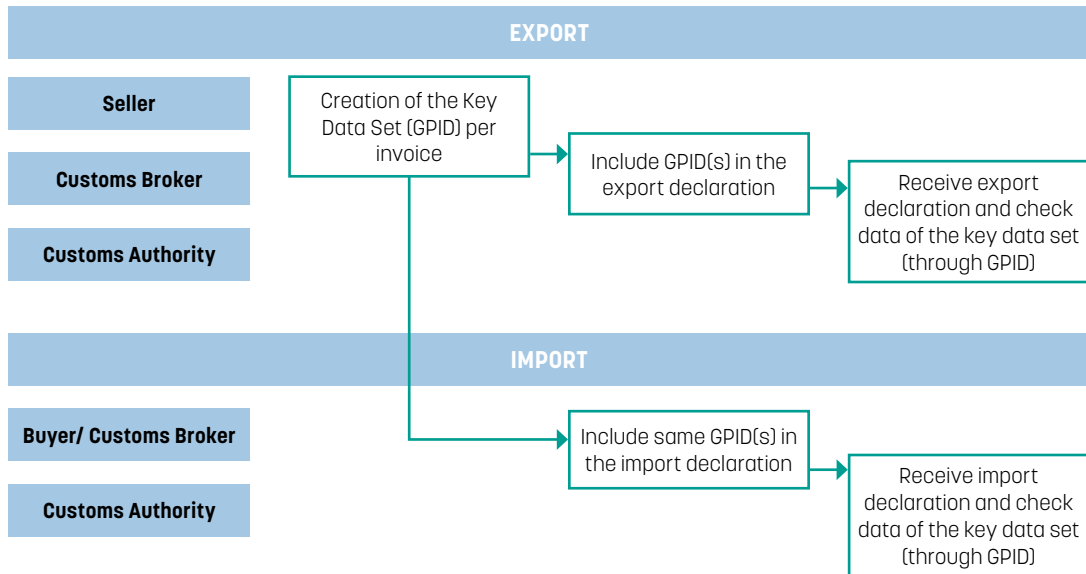
CONTENT OF THE KEY DATA SET	
<p><b>GOODS PASSPORT ID (GPID)</b></p> <ul style="list-style-type: none"> <li>Uniquely identifying ID of the Key Data Set</li> </ul> <p><b>SELLER</b></p> <ul style="list-style-type: none"> <li>Company Name</li> <li>Address (Street, Postcode, City, Country)</li> <li>Trader ID (e.g., EORI)</li> </ul> <p><b>BUYER</b></p> <ul style="list-style-type: none"> <li>Company Name</li> <li>Address (Street, Postcode, City, Country)</li> <li>Trader ID (e.g., EORI)</li> </ul>	<p><b>INVOICE</b></p> <ul style="list-style-type: none"> <li>Invoice Number</li> <li>Invoice Date</li> </ul> <p><b>GOODS (ONE ENTRY PER GOOD)</b></p> <ul style="list-style-type: none"> <li>Sequence Number</li> <li>Description</li> <li>HS Subheading Code (Commodity Code/ Binding Tariff Reference ID)</li> <li>Value (as per the invoice)</li> <li>Currency</li> <li>Quantity (number of packages)</li> <li>Net mass</li> <li>Preferential Origin</li> <li>Country of Origin</li> </ul>

<sup>1</sup> Brookbanks, M. and Parry, G. (2022), “The impact of a blockchain platform on trust in established relationships: a case study of wine supply chains”, *Supply Chain Management*, Vol. 27 No. 7, pp. 128-146. <https://doi.org/10.1108/SCM-05-2021-0227>, last accessed 25 April 2023.

The process of using such a reduced data set, as demonstrated in Figure 2, starts with the seller (in this case identical to the exporter). Concurrently with issuing a commercial invoice, the seller will issue a key data set and store it on the blockchain. This data set can then be forwarded to brokers, LSPs and Customs authorities in both the country of export and the country of import via blockchain.

It can add value and trust as it represents a tamperproof source of crucial information that can be referenced in Customs declarations and is also available for spot checks at the physical border or post-clearance audits.

Figure 2: A vision for the GPID process



### Extending the data set

With further development, extension of the key data set usage for security controls, RFID gates, weighbridges, and other applications that do not require full data sets, is conceivable. What is more, by shifting towards the blockchain-based sharing of Customs information, data duplication from entering data multiple times, manually or automatically, can be reduced. Provided that blockchain-supported data exchange is adopted, then extension to export control, compliance with reporting obligations, licence monitoring, or automated Customs valuation, would also be conceivable.

### A look around

However, introducing blockchain technology into logistics, and even Customs, processes is nothing radically new. It has been tried before – the idea is promising, and the undertaking is complicated. The main obstacles to introducing blockchain into the Customs domain include a lack of expertise, the cost, and poor adoption by other stakeholders.<sup>2</sup>

Overcoming these hurdles has proven to be incredibly difficult. In a questionnaire to the 183 WCO Members, the responses highlighted that only Argentina and Uruguay had reported full deployment of blockchain and Distributed Ledger Technologies.<sup>3</sup> Other projects and initiatives remain at various stages of progress, while some have been discontinued.

Ongoing projects include the European Commission research project “SEED-on-Blockchain”, and “Made in Italy”, which is an initiative to use blockchain to certify high-quality products at various levels. Georgia issues preferential CoOs with data stored on blockchain, and Australia ran a PoC with Singapore that authenticated the provenance of CoOs using blockchain.<sup>4</sup> Further prominent examples include the long-standing blockchain project CADENA, which has seen a number of South American countries exchange AEO information with beneficial results, as well as Mercosur’s bConnect project, which follows the same aim.

*We offer neutral, cross-company collaboration to achieve broad acceptance of common solutions, independent of individual interests. For blockchain in general and the Customs use case in particular, these are the same requirements: Creating a generally accepted format and establishing a neutral solution.*

Andreas Nettstraeter,  
Open Logistics  
Foundation

<sup>2</sup> WCO/WTO (2022) – Study report on disruptive technologies

<sup>3</sup> Idem

<sup>4</sup> WCO/WTO (2022) – The role of advanced technologies in cross-border trade: A Customs perspective

One of the notable commercial successes has been the Egyptian Government's agreement with CargoX to use its blockchain document transfer gateway. They state that the average cargo release time has decreased from 29 days to 9 days.<sup>5</sup> However, it comes at a cost to traders or LSPs and is primarily a document-based blockchain rather than data-based. The service comes with the benefit of reduced delays, but there is a cost for each document on the blockchain (e.g., USD 60 for a Guarantee of Origin).<sup>6</sup>

On the other hand, there are projects that started with the same aim, but have since been discontinued. According to official statements, the TradeLens blockchain platform (founded by Maersk and IBM) was discontinued because the level of support and cooperation needed for it to succeed was not achieved.<sup>7</sup> More specifically, there were uncertainties in terms of governance

processes, scalability and profitability for each participant.

### Open source is the solution

For future projects, this underlines the importance of an open approach regarding decision processes, software development and governance structures. An open-source development approach, which is primarily a means of achieving critical mass of technology deployment and only secondarily strives for a commercial solution, could provide an answer here.

However, such common open-source development, as proposed here, requires agreement on a set of standards. This has been recognized, as a WTO paper concluded: "Blockchain could make international trade smarter, but smart trade requires smart

<sup>5</sup> <https://cargox.io/blog/cargox-delegating/>, last accessed 25 April 2023.

<sup>6</sup> <https://cargox.io/static/files/CargoX-Price-List.pdf>, last accessed 25 April 2023.

<sup>7</sup> <https://www.tradelens.com/>, last accessed 25 April 2023.

# We SOLVE your CUSTOMS REQUIREMENTS



- » 40 years of **expertise** in **customs clearance** and **consulting**
- » ALS **"MOTA"** - customer portal providing digital data flows and live statuses
- » **Intelligent Document Processing** - increased efficiency and accuracy
- » **Blockchain Trusted Data**
- » **Real people**, with **real offices** across **38 locations**



*Say Hello to ALS and Seamless Global Trade*

**info@als-cs.com**

standardization – and smart standardization can only happen through cooperation.”<sup>8</sup>

The approach focuses on the simplicity of the data sets that are exchanged and on recognizing that authority participation is crucial to achieving the benefits that blockchain promises for reducing border delays. The GPID is different because it is a solution that helps authorities to help honest stakeholders. It is different because it is based on open-source software instead of isolated commercial solutions. It is easier to handle because it is easier to reach agreement over a smaller, simpler data set than a complex one, and thus consensus can be reached faster.

### Customs participation in building common standards is crucial

The opportunity to overcome fragmented systems and increase visibility within cross-border supply chains lies in developing and introducing open-source blockchain applications based on joint standards into Customs processes. To do so, it is necessary to build common standards together with logistics service providers, Customs brokers, and software providers, with guidance and oversight from Customs authorities.

These standardized basic functionalities can be developed by the logistics and Customs community, allowing companies to share development risks and costs. On top of these basic components, each company can then build and offer individual, market-differentiating services and solutions. This is the approach advocated and represented by the Open Logistics Foundation.

We have already built software, which we now seek to deploy. Customs authorities and other parties interested in taking part in a Live Pilot to test out the first available functions of the Open Customs Blockchain and shape future standards together with key logistics and Customs stakeholders can contact the authors.

#### More information

Mr. Roman Koller  
Research associate  
Fraunhofer Institute for Material Flow and Logistics IML  
roman.koller@iml.fraunhofer.de

Mr. Michael Douglas  
Senior Consultant  
ALS Customs Services  
mdouglas@als-cs.com

---

*The truth is that many delays are the result of a (natural) lack of trust: authorities need to protect their territories against tax/ duty evasion, fraud, smuggling, and criminals. Introducing blockchain technology into Customs processes can facilitate the building of trust.*

---

Michael Douglas, ALS Customs Services

---

## About the Open Logistics Foundation



open logistics  
foundation

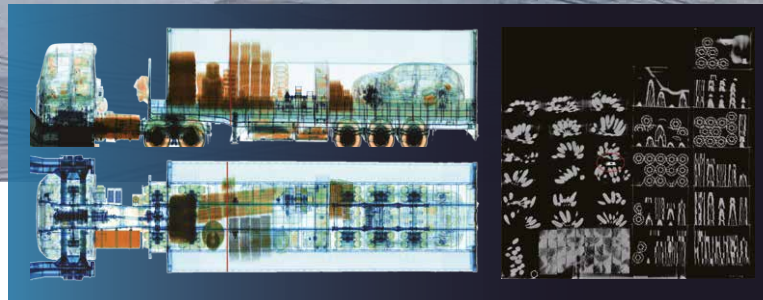
Established in 2021, the Open Logistics Foundation (OLF) is a non-profit operating foundation advocating the promotion of open-source applications in logistics. Its primary goal is to facilitate collaborative development of open-source solutions to existing problems in logistics and supply chain management. Its community of innovators develops common standards, tools and services, which can be used commercially by any player in the industry.

Its members include major players in the logistics and Customs sector, such as DB Schenker, Dachser, LKW Walter, Duisport, DHL, Rhenus Logistics and ALS Customs Services. It also boasts members from the technology sector, such as AEB, IP Customs Solutions, Setlog, TradeLink, Veroo, and many more. Finally, the OLF has the Fraunhofer Institute for Material Flow and Logistics IML as a major academic resource; they advise companies of all industries and sizes on all questions about material flow and logistics. The OLF continues to expand its membership and can be reached at: <https://openlogisticsfoundation.org>.





**Innovation  
Starts  
With You**



 **NUCTECH**

FG9000DT, the world's first CT-based cargo and vehicle inspection system, has been in operation and completed 100,000 scans as of today. NUCTECH's inspection solution reforms the radiation imaging technology of cargo and vehicles, achieving a leap from 2D to 3D, creating an unprecedented imaging experience, hence bringing unlimited possibilities for the future of smart customs.

# Harnessing the power of the cosmos to detect illicit trade

By A. Hektor, GScan

Detecting some regulated or prohibited commodities through the use of traditional non-intrusive detection equipment remains a challenge today. Take cocaine, for example. It is very often concealed in shipments of bananas and other fruits with a very similar density to the drug. Since x-ray is a density-based discriminating technology, it is rather difficult to differentiate cocaine from the fruit on an image generated by an x-ray scanner.

## About muon tomography

A technology called muon tomography could solve this issue. It uses information about the absorption of cosmic ray muons to measure the thickness of the materials crossed by the muons, to generate three-dimensional images. Muons are naturally occurring sub-atomic particles which are 100% safe to humans, food, medicines and animals. They have been around for billions of years and are created when inter-galactic high-energy cosmic rays collide with molecules in the Earth's atmosphere. These muons travel at nearly the speed of light and are highly penetrating. Most of them are able to travel tens or hundreds of metres into the Earth's crust.

The first known use of simple muon detectors was documented in 1970 when Luis W. Alvarez investigated the interior of the Chephren's pyramid at Giza, Egypt, to find hidden and unknown chambers in the stonework.<sup>1</sup> Although the technology has existed for some decades now, the high cost of its components has severely limited its spread. Muon flux activity is expected at around 10,000 particles per square

metre per minute, and in order to account for all muon trajectories, speed and spin, some serious computations must be carried out. Moreover, in an environment such as trade or for security purposes, where time is of the essence, this operation must be performed over a short period of time.

Recent developments, especially with silicon chips and machine-learning technology becoming more affordable, have changed the game. A scan operation that would have taken several hours twenty years ago, now requires only a few minutes. Muon tomography today finds applications in domains such as geology (study of volcanoes), archeology (study of pyramids and tombs), construction (to assess the safety and integrity of structures) and, since 2003,<sup>2</sup> cargo non-intrusive inspection (NII).

For NII purposes, muons are tracked through detectors placed at the top and bottom of the object to be scanned. As particles travel through the top detector, their trajectory is calculated. As they pass through the object, there will be a degree of scattering which is dependent on the atomic structure of the object. The denser an object is at the atomic level, the more scattering of the muons will occur. The exiting angle of the muon is measured at the bottom detector, and the scattering angle data is computed against a database using an image reconstruction algorithm. A 3D image is then generated. But, more interestingly, the atomic structure of the object is also estimated and can be matched with a commodity if it is listed in the machine's database.

1 Alvarez, L. W., Anderson, J. A., Bedwei, F. E., Burkhard, J., Fakhry, A., Girgis, A. & Yazolino, L. (1970). Search for Hidden Chambers in the Pyramids: The structure of the Second Pyramid of Giza is determined by cosmic-ray absorption. *Science*, 167(3919), 832-839.

2 Borozdin, K. N., Hogan, G. E., Morris, C., Priedhorsky, W. C., Saunders, A., Schultz, L. J., & Teasdale, M. E. (2003). Radiographic imaging with cosmic-ray muons. *Nature*, 422(6929), 277-277.

If a target commodity is found, the system sends an alert with information on the coordinates of the item of interest. The machine's database can be updated according to the client's needs. A weight estimation is also provided; its accuracy depends on the scanning time – for example, the scanning time usually used for a sea container gives an accuracy level of tens of kilograms.

### **Muons versus x-ray**

The natural energy level of muons is on average 1,000 times that of the largest x-ray machines, so muons penetrate even the densest of cargo including lead, steel, cement, rocks, uranium and iron ore, which x-rays cannot. The ionizing nature of the x-rays also means they can change cell structures in biological material and their use is thus subject to stringent legislation to prevent individuals from being dangerously exposed to them. The danger of X-ray exposure is mitigated by reducing the exposure time to a minimum, setting a certain distance from the ray source, shielding with lead or other heavy material, or a combination of all three. Since the muon flux is not ionizing and occurs naturally, it is not harmful to humans and calls for no shielding whatsoever. In fact, since you started reading this article around 20,000 muons have passed through your body.

This means that the detectors can be installed anywhere, including at border control points where only documentary controls are currently conducted, as well as at ports, airports and mail centers. Muon tomography can be used as a primary means of non-intrusive inspection of all people, vehicle and cargo movements, and can be integrated into existing IT systems.

The capability of muon flux technology (MFT) to provide material identification opens up new possibilities in terms of efficiency and the experience of the person being controlled. Let's take air travel, for example. Nowadays we queue up to go through airport security checkpoints, to have both our baggage and ourselves scanned, one at a time. This is mainly due to the limitations of x-ray scanning technology, which is energy-consuming. What the scanner operators are looking for are clues to the presence of explosive devices such as detonators, wires and timers, or manual weapons such as knives and guns. Although some machines have automatic

threat recognition (ATR) software installed, they still require qualified operators and enough time to process all the passengers.

MFT is set to detect actual explosive material, not just the devices. It also makes it possible to scan liquids, which current technologies cannot do. The MFT detector panels may be built into the walls of the building, thereby eliminating the need for queueing altogether. The whole room then becomes a passive scanner, with passengers and their baggage being scanned without intruding on people's privacy or jeopardizing their health.

The other difference between muon flux technology and x-ray is that MFT scanners have a much lower carbon footprint and use less electricity. As there are no moving parts, and the detectors are made primarily from plastic, they are also expected to have a significantly longer lifespan.

The selling price of the scanners will be about the same as that of x-ray CT systems. The maintenance costs are lower, as there are no depreciable radiation sources or moving parts in the scanner. Some of the scanners will be designed to tolerate hot climates and seaside conditions.

### **Performance**

Software enabling data matching of cargo contents to electronic manifest data, also known as eFTi,<sup>3</sup> is under development. So far the focus has been on containerized cargo, but the detectors and software can be used in all sorts of configurations, from small baggage scanners to large container or truck scanners, and even entire buildings. Solutions are scalable as the sensor modules can be arranged in various ways, like LEGO® blocks.

The first MFT scanner system to be used for Customs inspection will be piloted in Summer 2023, and more deployments are planned in the years to come. We believe that 50 years after its first trials, muon tomography is ready to revolutionize border controls and that the power of the cosmos can now help make the world a safer and fairer place.

### **More information**

<https://www.gscan.eu>

---

*The capability of muon flux technology (MFT) to provide material identification opens up new possibilities in terms of efficiency and the experience of the person being controlled.*

---

# CARGOES CUSTOMS

The intelligent customs administration system built upon 40 years of experience in the sector and powered by the latest technologies.

CUSTOMS  
AUTHORITIES

TRADING  
COMMUNITIES

OTHER GOV'T.  
AGENCIES



MANIFEST MANAGEMENT



DECLARATION MANAGEMENT



INTELLIGENCE MANAGEMENT



SMART INSPECTION



REVENUE MANAGEMENT



KPI MANAGEMENT



SINGLE WINDOW



ARTIFICIAL INTELLIGENCE

