SECURING AND FACILITATING TRADE IN EAST AND SOUTHERN AFRICA
By Dr Ferdinand Everest Ntuli*

Abstract

Customs administrations have a national obligation to secure and also to facilitate trade. From a customs perspective, securing trade refers to the implementation of controls on behalf of other government arms and departments. Trade facilitation has been defined in various ways by different organizations. However, for the purposes of this study the WCO’s definition shall be preferred, which refers to trade facilitation as the avoidance of unnecessary trade restrictiveness. The importance of this study stems from the apparent incompatibility of trade security and trade facilitation. Even though the two concepts refer to different processes it is critical for customs administrations to secure and facilitate trade.

International organizations, such as the WTO, WCO, UNCTAD and many others have embarked upon various programmes with an aim to merge trade security and trade facilitation. Various measures have been implemented in an effort to attain an integrated approach, which accommodates the two aspects of global trade. The WTO Trade Facilitation Agreement (WTO TFA) has introduced various measures aimed at promoting the security and facilitation of international trade. Trade security and facilitation have also been highlighted in the Revised Kyoto Convention on the simplification and harmonization of Customs procedures of 2006. The aim of the WCO Mercator Programme is to enable the implementation of the guidelines of the WTO TFA through WCO trade facilitation instruments, which include the SAFE Framework of Standards to Secure and Facilitate Global Trade, and guidelines of the Kyoto Convention of 2006.

This chapter examines trade security and facilitation issues within the context of East and Southern Africa with particular emphasis on the WTO TFA and the efforts under the Mercator Programme. Against this background, the chapter considers the successes and limitations of attaining an approach that integrates trade facilitation and security. It is envisaged that the study will provide the basis for improving the integration of trade security and facilitation.

Key Words: Facilitating Trade, Trade security, Risk Management
1 INTRODUCTION

The World Trade Organisation (WTO) Trade Facilitation Agreement (TFA) offers policy guidelines for streamlining trade while the World Customs Organisation (WCO) is responsible for developing instruments that aid in the implementation of trade facilitation measures. It is equally important to take note of the assertion by Widdowson\(^1\) that the success of trade facilitation is dependent on striking a balance between the facilitation and regulatory control of trade. Traders prefer the most cost effective way of importing and exporting.\(^2\) Customs administrations have an obligation to regulate global trade in conformity with national legislation, which seeks to secure the wellbeing of citizens.

In the face of increased global trade the WCO has highlighted the need to ensure robust controlled trade. It has become imperative for Customs administrations to have a risk management policy that ensures security and expediency in the movement of goods across borders.\(^3\) In developing such a risk management policy Customs administrators have to be clear on their understanding of the concept of risk management.

The WCO points out that in building a framework for managing risk it is important to understand that risk in itself is the effect of uncertainty on organizational goals and a risk management policy refers to the statement of an administrator’s overall intentions and direction regarding risk management.\(^4\) Risk assessment, which is the overall process of: risk identification, risk analysis, risk evaluation and prioritization; is also critical in building a framework for managing risk. The Revised Kyoto Convention\(^5\) promotes trade facilitation, enforcement of regulatory controls and outlines 600 standards on harmonization and simplification of trade. One of its key tenets is that of maintaining the balance between trade security and facilitation.

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\(^{2}\) Ibid 2.

\(^{3}\) World Customs Organization (WCO), ‘WCO Customs Risk Management Compendium’ (Compendium, World Customs Organization, 2013), 3.

\(^{4}\) Ibid 8.

The SAFE Framework of Standards to Secure and Facilitate Global Trade (SAFE Framework)\(^6\) also addresses facilitation and security concerns by prescribing minimum principles and standards necessary for securing global value chains that WCO member states should embrace.

There are several other studies and reports that have focused on trade facilitation and security, most of which have addressed the issues from the context of Europe and South East Asia.\(^7\) However, very little work has focused on the East and Southern Africa region. This paper critically analyses the trade facilitation and security measures in Eastern and Southern Africa. The study analyses instruments of trade security and facilitation with the aim of offering recommendations for improved control of goods that would concurrently promote expedient trade.

In order to integrate trade facilitation and security the author conducted a study within the framework of the Global Value Chains Theory and more specifically the Integrated Value Chain System Theory. With goods crossing borders multiple times trade facilitation has become an important issue in international trade along Global Value Chains.\(^8\) The Global Value Chains theory is based on the premise that there is an increase in world trade global interconnectivity. This has created interdependency throughout the world in terms of preserving security and expediting trade. A security breach in Zimbabwe has the potential to threaten peace even beyond the East and Southern Africa Region. This calls on a global approach to security and trade issues. The Global Value Chains Theory is concerned with attaining free and risk free trade. Global security concerns issues such as corrupt practices by Customs administrations, crossing of illegal immigrants, human trafficking, cross border terrorist activities and smuggling of narcotics and weapons, which magnify the importance of resolving security concerns associated with trade. The Value Chain System Integration Theory is hinged upon the Global Value Chains Theory as put forward by Gereffi.\(^9\) The Value Chains

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System Integration Theory goes further to emphasize how “… the chain of activities executed by two or more separate organizations”¹⁰ may bring customer satisfaction. The fundamental attribute is the involvement of multiple stakeholders in the Value Chains System Integration Theory. The theory bodes well with the idea of securing and facilitating trade because the two functions require the efforts of two or more organizations, combining the notion of trade facilitation and security. This brings together organizations geared for trade promotion, clearance of goods and organizations such as police and immigration, which safeguard security and other regulatory matters. This calls for an integrated approach in dealing with value chains. The SAFE Framework is also concerned with both facilitation and security.

The major objective of the study is to critically analyse the policies and instruments that are in place to secure and facilitate trade in Eastern and Southern Africa, with particular focus on identifying the measures implemented, establishing potential challenges and bottlenecks, and further making recommendations on how to enhance trade security within the region.

2 METHODOLOGY, RESEARCH DESIGN AND SCOPE OF THE STUDY

2.1 Research Design

The researcher chose a descriptive survey approach, focusing on describing and interpreting the role of Customs administrations in enhancing trade facilitation and security. The descriptive approach was appropriate for the study because it does not influence the behaviour of subjects in any way and is based on the natural setting capturing accounts and experiences of traders (importers and exporters).

Primary data is based on the case study of Zimbabwe. Notwithstanding the primary source of data used for Zimbabwe, documentary (literature) sources of information were used to obtain secondary data pertaining to other countries in Eastern and Southern Africa.

2.2 Scope of the Study

The study examined concepts and instruments of ensuring that the citizenry is not negatively affected by illegal activities at border crossings such as smuggling of narcotics, dangerous arms, human trafficking, cross border terrorist activities and import tax evasion. The study

also looked at trade facilitation measures and how they relate to trade security issues. The study examined concepts within the context of East and Southern Africa countries.

### 2.3 Research Methodology

The research was based on a mixture of qualitative and quantitative methods with more emphasis on qualitative methods. The qualitative approach was appropriate for the research given that the study dealt in value laden phenomenon such as how to secure and control trade. The research involved an examination of attitudes, feelings, experiences and accounts pertaining to trade and security. The researcher sought to understand the relevance of legislation, and also the extent of cooperation between Customs administrations and cooperation with stakeholders at border points. Such phenomenon can best be described in words and in the context of lived experiences and accounts by traders responding to the questionnaire. The inquiry requires a largely interpretive approach. Ravitch & Carl\(^{11}\) underscore the need to use the most appropriate methodology taking into consideration the nature of the study. Although qualitative data was helpful in constructing ideas and knowledge based on descriptive words used by subjects in responding to questions, in order to neutralize the subjectivity and bias associated with the qualitative approach the researcher introduced quantitative methods. Some of the data was amenable to quantitative analysis such as Customs clearance turnaround times. Data was displayed in tables and charts making it independent from the interpretations and opinions of the researcher and also allowing objective numerical analysis.

Qualitative and quantitative data was collected using a hand delivered questionnaire. Some questions required interpretations and opinions while some required precise facts and figures. The questionnaire containing open ended and closed questions was distributed to the different categories of traders to collect primary data at four border posts in Zimbabwe. Open ended questions addressed the qualitative aspects of the research while the closed questions required precise factual answers, addressing the quantitative dimensions. It was envisaged that this would be time saving as opposed to face to face interviews. The data was analysed using the Statistical Package for Social Sciences (SPSS)\(^{12}\) which presented the data in tables and figures.

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2.4 Research Sampling

The researcher used convenience sampling in identifying Zimbabwe as the case study from which primary information was sourced out of the countries in East and Southern Africa. Zimbabwe is a convenient sample for primary data given that the researcher is based in Zimbabwe and had easier access to the respondents. While the research is concerned with analysing trade security and facilitation across East and Southern Africa, given the expansive area to be covered the study had to contend with a conveniently accessible sample within Zimbabwe. Considering the number of countries involved, the limited time, coupled with resource constraints it was not feasible to physically visit all the East and Southern African countries.

The universe population of the research consisted of traders in East and Southern Africa. In light of the fact that the research was cross-sectional, as it was conducted within only 3 months, from September 2016 to November 2016, it was expedient that the researcher had to identify a workable sample within the limited time. The researcher used stratified sampling to ensure that each of the three categories of traders was captured, namely: large companies, Small to Medium sized Enterprises (SMEs) and informal traders. The population of large companies and medium to small companies importing and exporting through Beitbridge, Chirundu, Harare and Mutare ports was 2500 in 2015 according to ZIMSTATS. The interval sampling technique was used where every tenth trader in each category was selected. A sample of 250 large and medium sized companies representing 10% of the population was identified. The sample was stratified as follows: 175 SMEs and 75 large companies, hence the SMEs accounted for 70% of the population while 30% was large companies. It was further established that there was a combined average of 1000 informal traders using Beitbridge and Chirundu on a daily basis from the ZIMRA passenger manifests and the researcher settled for a sample of 100 informal traders representing 10% of the population. The researcher attained the 10% sample by using interval sampling, periodically selecting every tenth subject from the informal traders importing and exporting.

The researcher however felt that it was imperative to reflect on trade security and facilitation in other countries within the region. This prompted the researcher to resort to secondary data contained in literature, which included journals, texts on conference proceedings and technical

reports of organizations such as EAC, SADC, WTO, UNECE, UNESCAP WTO and WCO. The major advantage of secondary data is that it is usually reviewed and tested, thus affirming its validity and reliability. Moreover, secondary data is less expensive to gather.

3 LIMITATIONS OF THE STUDY
The research was cross-sectional since it was conducted over a limited period of three months. Trading and travelling is seasonal with an increase in traded goods and tourists during and towards the festive seasons. Such fluctuations in volumes of traders and travellers could affect reliability of results.

4 EXISTING MEASURES FOR SECURING AND FACILITATING TRADE

4.1 The Role of Customs in Trade Security and Facilitation
There has been an increase in volumes of goods traded across borders due to globalization of trade. The high volumes and increasing varieties of goods being traded across borders has made the work of monitoring cross border trade overwhelming for Customs administrators. Zimbabwe acceded to the Revised Kyoto Convention\textsuperscript{14} with the intention of implementing the WCO’s new Framework. The complexity of Customs administration lies in effecting controls on behalf of all government departments and agencies that deal with trade issues. Areas covered by Customs include health, immigration, police, agriculture, environment, trade statistics, wildlife, museums and national monuments among others. This cocktail of responsibilities may be perplexing and requires a systematic and structured approach of managing risks.\textsuperscript{15} Besides the wide ranging responsibilities thrust upon Customs administrators, they are expected to maximize efficiency while safeguarding legitimate regulatory objectives.\textsuperscript{16} In order to strike the balance between the regulatory and trade facilitation function, Widdowson, proposes a risk managed approach.\textsuperscript{17} A risk managed approach is contrary to the traditional “gate keeper” style of administering 100% checks. The “village policeman” approach is more appropriate where information or intelligence is used as a basis for carrying out targeted searches. Targeted

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\textsuperscript{14} Revised Kyoto Convention of 2006, above n 5.
\textsuperscript{15} Anne-Marie Geourjon & Bertrand Laporte, ‘Risk Management for Targeting Customs Controls in Developing Countries: A Risky Venture for Revenue Performance?’ (2005)25(2) Public Administration and Development, 105, 106.
\textsuperscript{17} David Widdowson, above n 1, 2.
searches enable Customs administrations to concentrate financial and human resources on areas perceived to be posing high risk.

In an effort to achieve trade security Harrison and Holloway identify three fundamental themes that need to be addressed by Customs administration: risk management, relationship between Customs and industry and also information management. Using the three themes as a framework the research will proceed to identify measures that have been applied by the Zimbabwe Revenue Authority (hereafter referred to as ZIMRA). The three themes were addressed in the attached questionnaire.

4.2 Ensuring Trade Security and Facilitation through Risk Committees
Zimbabwe Customs administration has a number of Risk Management measures that specifically support a targeted approach, assisting officers to concentrate on high risk areas. Customs administration, according to the WCO, entails having an organizational framework for managing risk.

In Zimbabwe as a means of securing trade while simultaneously facilitating trade, Risk Committees have been set up at port level or station level. Risk committees also exist at Regional level under the Technical Services section. Risk Committees are some of the instruments set up to oversee efforts directed at determining risk in importations and exports with a view to assess and manage risk or uncertainty on organizational goals. At station level risks identified are reviewed and consolidated for onward transmission to the Regional Technical services section where there are units specializing in risk management. Ultimately information pertaining to risk management is reported to the National Risk Management Unit.

4.3 Securing and Facilitating Trade: From ASYCUDA++ to ASYCUDA WORLD (E-Customs)
According to its mandate and vision Zimbabwe Customs is geared to optimise revenue collection and ensure a secure supply chain. Zimbabwe Customs administration migrated from

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18 Mark Harrison & Steve Holloway, ‘Challenges for Customs Purpose’ (Centre for Customs and Excise Studies Annual Conference of APEC Centres, Melbourne, 18-20 April 2007) 4.
20 World Customs Organization, above n 3, 8.
21 Ibid 13.
ASYCUDA ++ to ASYCUDA World, which is a web-based system with the following functionalities:

- Enhanced system controls using electronic control as opposed to paper based controls
- Intelligent electronics Risk Management System that is updated periodically
- Easy compilation of trade statistics
- Interfacing with other government and international organizations
- Automation of all Customs processes
- Non-intrusive search and transit monitoring methods
- Easy navigation of the system on the web page.

ASYCUDA World has been instrumental in risk profiling, allowing systematic targeting of areas regarded as high risk. Forty seven countries in Africa are either using ASYCUDA World or ASYCUDA++.  

4.4 Non-Intrusive Inspections

The use of scanners has enhanced Zimbabwe Customs risk management capacity. The mobile scanners received in 2013 have the potential to scan 20 truckloads per hour. Non-Intrusive searches have the advantage of being less time consuming, require less labour and are more effective. All the major borders in Zimbabwe now have scanners for baggage and commercial searches.

4.5 Managing Risk and Facilitating Transit Cargo

Transit fraud poses a great threat to trade security within Southern Africa. Many of the principles and good practices for transit facilitation are set out in GATT/WTO Article V (Freedom of Transit). Transit fraud will be effectively curbed by the introduction of the cargo tracking system by ZIMRA. There is need to establish an effective Customs guarantee system

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26 United Nations Economic and Social Commission for Asia and the Pacific (UN/ESCAP), above n 5, 111.
for goods in transit to secure duties at stake. To this end the Zimbabwe Customs managed, in December 2016, to roll out the Electronic Cargo Tracking System (ECTS) uses the Geographical Positioning System (GPS). Transit cargo is monitored by arming conveyances transporting cargo with electronic seals. The tracking system is integrated into the existing ASYCUDA World system and allows real time tracking of the cargo up to the point of exit.

4.6 Managing and Facilitating Trade through Post Clearance Audits

The East African Community (EAC) has managed to assume a regional approach to risk management through its Customs post clearance audit approach. A post clearance audit manual was developed for use among EAC member states, based on the rationale that increase in international trade, coupled with declining resources available for customs administrations and the need for trade facilitation has necessitated the adoption of risk management and audit based controls. The existence of a regional audit manual ensures uniformity in the application of post clearance procedures and risk management.

4.7 Building Trust and Cooperation between Customs and Industry for Safe Trade

The second theme of trade security is hinged upon the relationship between Customs and industry. Generally, honest traders seek recognition for their good track record of compliance. ZIMRA rewards low risk traders with Authorized Economic Operator (AEO) status. The advantage of the status is that, low risk trusted traders are not subjected to rigorous inspections. The salient features about the AEO status are fewer physical and document based controls, priority treatment of consignments selected for control and also recognition as a safe and secure business partner. When the AEO status is extended to other traders who fall within other Customs administrations it is referred to as the Mutual Recognition Arrangement (MRA).

The criteria used to place traders on the authorized traders scheme is based on risk management techniques. The MRA status confers favourable treatment to a trader within a number of

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28 Ibid, 2.
30 For studies on the Authorised Economic Operator principle refer to United Nations Economic and Social Commission for Asia and the Pacific (UN/ESCAP) n 9, 175.
32 For studies on the Mutual Recognition Arrangement refer to United Nations Economic and Social Commission for Asia and the Pacific (UN/ESCAP), above n 9, 82.
countries especially within a trading block. MRA status is however not provided for by ZIMRA.

Through its corporate plan, the Kenyan Government made strides towards improving the relationship between Customs and industry. The Kenya Revenue Authority’s Sixth Corporate Plan, running for three years, ending on 30 June 2018 explicitly declares its commitment to enhancing Customs focus on border security and trade facilitation. Under the Corporate Plan trade security is based on “Building Trust” between Customs and industry. This is consistent with the WCO Risk Management Compendium, which highlights the importance of treating risk management and building a relationship with clients as an organizational culture.

4.8 Enhancing Trade Security and Facilitation through Management of Information

The third theme under trade security and facilitation may be analysed within the context of information management. Intelligence or information is central to provision of trade security. The Coordinated Border Management (CBM) concept is instrumental in consolidating information that is necessary for provision of security. Coordinated Border Management (CBM) operates on the basis of sharing information. Apart from Coordinated Border Management (CBM), the advance cargo and advance passenger name record are also useful in the provision of vital information for trade security. Regional integration provides an enabling environment for the free movement of useful information within a bloc.

SADC has laid down guidelines for Coordinated Border Management (CBM) refers to national and international coordination and cooperation among all relevant authorities and agencies involved in the protection of the interests of the state at the border to establish effective, efficient and coordinated border management, in order to reach the objective of open, but well controlled and secure borders. The basic tenets of Coordinated Border Management (CBM)

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33 Kenya Revenue Authority (KRA), ‘Kenya Revenue Authority Sixth Corporate Plan’ (Strategic Plan Document, Kenya Revenue Authority, September 18, 2015) 18.
34 Ibid 18.
are the One Stop Border Post (OSBP)\textsuperscript{38} and Single Window Concept (SW)\textsuperscript{39} concept. It is also proposed in the SADC guidelines that there is need for a Border Agency.

Zimbabwe and Zambia have made strides in implementing the guidelines by opening their first One Stop Border Post (OSBP) at Chirundu, giving rise to increased international coordination. Article 9 of the COMESA Treaty (1994),\textsuperscript{40} encourages member states to take up trade facilitation programmes. A collaborative approach is encouraged among member states. The OSBP concept was an outcome of a COMESA Council of Ministers meeting held in Kigali, Rwanda in 2005 as a trade facilitation vehicle to enhance trade in the North South Corridor.\textsuperscript{41}

In Zimbabwe the OSBP concept was introduced at Chirundu Border post on 5 December 2009. The project was financed by the United Kingdom’s Department for International Development (DFID) and the Japanese International Cooperation Agency (JICA).

The advance cargo and passenger manifest was introduced by the Zimbabwe government in January 2012 to enhance trade security and facilitation. Under the arrangement transporters, cross border bus operators and airlines are required to submit a list of cargo and passengers on board not later than three hours before arrival, the rationale being to allow adequate time in advance for Customs to risk profile goods and passengers. The arrangement was introduced on the back of supporting legislation in the Zimbabwe Customs and Excise Act Chapter 23:02 following the 2012 Zimbabwe National Budget Statement.\textsuperscript{42}

In its endeavour to secure and facilitate trade, ZIMRA has allowed importers to pre-clear their shipments even when they are still at the point of loading. The logic being to reduce the delay caused when trucks have to await document processing at the border points. Where shipments are pre-cleared, the release documents are only issued upon arrival of the truck at the border. This facility has been embraced by the importing community as it saves on time and demurrages.

\textsuperscript{38} For studies on the One Stop Border Post (OSBP) refer to United Nations Economic Commission for Europe & Organization for Security and Cooperation in Europe, (UN/ECE & OSCE), above n 36, 45.

\textsuperscript{39} For studies on the Single Window (SW) refer to United Nations Economic Commission for Europe & Organization for Security and Cooperation in Europe, (UN/ECE & OSCE), above n 36, 44.


\textsuperscript{41} Erich Kieck, ‘Consolidated Border Management: Unlocking Trade Opportunities through the One Stop Border Post’ (2010), 4(1) World Customs Journal, 1, 3.

Under the SW concept data is entered into one electronic system and all stakeholders involved in clearances can make use of the data. All data from the agencies involved is captured on one document. The SW concept was incorporated into legislation at the beginning of 2006. Legislation in place (Customs and Excise (General) Regulations. Statutory Instrument 154 of 2001)\(^{43}\) has created an enabling environment for the SW concept by allowing for the lodging of standardized information and documents by traders, single submission of information, coordinated controls, sharing of information between traders and government and also amongst government agencies, and recognises the SW system as a source of trade related government information. The process of implementation remains an on-going process in Zimbabwe with ZIMRA- having managed to roll out a single collection point of all border fees collected at entry points by the various stakeholders situated at the border.

5 CHALLENGES AND BOTTLENECKS IN SECURING AND FACILITATING TRADE

5.1 The Importance of Risk Management
The aim of this chapter is to establish the extent to which countries in East and Southern Africa have embraced the idea of securing and facilitating trade, mainly through the concept of risk management. Technical reports from regional groupings and related literature were used to understand the situation for other countries within ESA besides Zimbabwe.

Firstly, the researchers identified efforts and measures towards risk management in Zimbabwe. The research covered four ports of entry. Traders who included informal traders, SMEs and large companies responded to a questionnaire (self-administered).

5.2 Impact of Risk Committees on Trade Security and Facilitation
Article VIII of GATT 1994\(^{44}\) (fees and formalities) deals with risk management in Customs administration and how a Customs administration is obligated to set up structures for managing risk. Risk assessment involves identifying high-risk consignments and those that are less risky,


with the ultimate aim of categorizing the consignments according to the risk that they pose to the administration.

The existence of Risk Committees in ZIMRA is an opportunity for facilitating trade and a demonstration of international best practice.45 Risk Committees manage risk. The Risk Committees exist at three levels: national, regional and station level. The Committees deliberate on issues pertaining to risk management and have come up with a national risk register and commercial risk register, the purpose being to use the intelligence gathered to feed into the Automated System for Customs Data (ASYCUDA) selectivity profiling platform. It is not clear if information gleaned from the Committees is used in the operations at station level. Respondents to the self-administered questionnaire in all three categories of traders concurred that some stations were carrying out 100% searches. This may be attributed to the risk associated with the products being traded. However in response to the open-ended question, which sought to establish challenges of importers, some respondents indicated that they were needlessly and repeatedly being subjected to physical examinations, even though they had clean records. Low risk traders should not be continuously subjected to 100% physical examinations if there is effective risk profiling. Respondents felt that if risk profiling was done, effectively there would be no need for 100% physical examinations. It was further suggested that risk profiling should look into many aspects of businesses, which include ownership, debts, track record and associated companies. Such information is related to the risk posed by a company. If all these aspects were looked into there might be no need to carry out 100% physical examinations.

Respondents raised concern over the fact that most of the information deliberated on by Risk Committees is biased towards commercial importations due to the belief that there is more revenue at stake when dealing with commercial importations. This may constitute a security breach because risk assessment is overlooked in non-formal trade.

Djankov, Freund and Pham 46 observe that 75% of the delays in the movement of products are caused by Customs procedures, clearances and physical examinations. Traders interviewed were mainly irked by the 100% physical examinations, with some observing that over the years they were repeatedly subjected to searches for similar goods, even though they complied with

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regulations. The following table captures responses on the extent to which individual factors contribute to constraining trade.

<table>
<thead>
<tr>
<th>Areas where trade is constrained</th>
<th>12.8</th>
<th>59.7</th>
<th>2.9</th>
<th>21.6</th>
<th>2.9</th>
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<td>Valuations</td>
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<td>Physical Examinations</td>
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<td>Malfunctioning equipment</td>
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<td>Documentary checks/DPC checks too long</td>
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<tr>
<td>Other</td>
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Own Research 2016

Traders also indicated that risk committees ought to be reviewed periodically to address operational shortcomings. Traders in all three categories, large companies, SMEs and informal traders were asked to complete a self-administered questionnaire. One of the questions, a closed ended question, provided five aspects that constrain trade. Respondents were asked to identify the aspect that greatly constrained their cross-border transactions. Information captured in the above table reflects responses to the question on which aspect contributes most to constraining trade. 59.7% of the respondents indicated that physical examinations inhibited free flow of trade the most, against 40.3% contributed by the other four factors. Risk committees are a risk management technique with the potential to reduce turnaround times and effective allocation of human resources. Effective risk committees ought to engage in risk profiling thereby avoiding time-consuming 100% physical examinations. Less physical examinations require less human resources. Risk Management should ensure that more resources are directed to high-risk products. If the Customs administration cannot direct more resources to high-risk consignments, efforts will be thinly spread allowing some consignments that pose a security threat to escape scrutiny. The trend of smuggling identified by UNECE & OSCE includes commercial fraud, counterfeiting, tax evasion in highly taxed goods such as cigarettes, drug trafficking, stolen motor vehicles, money laundering, electronic crime, theft of intellectual or cultural property, trafficking of endangered species, arms, toxic waste or weapons of mass
destruction. In order to curb the sophisticated type of smuggling Customs officials need to be furnished with information. While physical inspection was formerly the main method of control at Border Crossing Points (BCPs), it is not always the most effective when faced with the above threats.

5.3 Effectiveness of Non-Intrusive Inspection Measures

Non-intrusive searches are provided for, under Standard 3 of the WCO SAFE Framework of Standards to Facilitate and Secure Global Trade. A total of 326 respondents representing 93.1% of the responses indicated that when fully functional, scanners are an effective form of automation. This gives credence to the argument that automation of Customs procedures is vital for improving inspections that lead to detection of fraud and prosecution, making borders safer. Scanning is a tool to address government concerns of revenue protection, safety and trade facilitation. Although scanners are rated as effective in managing risk, traders responding to the self-administered questionnaire highlighted challenges or constraints to trade facilitation. Some respondents reported that at times the scanners on both, the Zimbabwean and Zambian side are not fully functional due to technical problems. Traders, especially those clearing commercial consignments, indicated that the positioning of the scanners on the Zambian side at times created congestion. The scanners are the first port of call on the Zambian side thus any functional glitches on their part could result in queues stretching for about 2km outside the Customs Control Zone. According to UNECE & OSCE, their overreliance on operator skills, lack of training, lack of experience, fatigue of the operator, inconclusive images and a high number of resultant physical examinations compromise the effectiveness of scanners. It however has to be appreciated that the scanning equipment is expensive to acquire. Customs Authorities may have to purchase the equipment gradually or seek external funding. The scanners still rely on the physical operation and monitoring of Customs officials, thus, their efficiency would be dependent on the integrity and skills of officials.

5.4 Efficacy in Managing Transit Cargo

ZIMRA secures transit cargo using bonds to cover duty at stake for consignments and grants them 3 days to exit the country. The web-based system ASYCUDA World has a module for managing transit cargo, which administers the bonds to secure duties that are outstanding.

\(^{48}\) Ibid 55.  
\(^{49}\) Ibid 55.  
\(^{50}\) Ibid 55.
Information gleaned from the open-ended questions on the questionnaire revealed that the movement of goods under a bond or surety has shortcomings. The cover of the bond or surety is susceptible to manipulation through misclassification or undervaluation of goods. A number of respondents interviewed highlighted that unscrupulous traders were capable of colluding with corrupt officers to process misleading paperwork that indicates that their goods would have exited the country when in fact they have been consumed locally.

Respondents to the open ended question indicated that ZIMRA has not been able to roll out the Electronic Tracking Cargo System (ETCS) to all ports of entry within the scheduled timelines because of the high cost associated with acquiring, installing and implementing the system. The respondents indicated that the Zimbabwe government embraced the ETCS technology to curb transit fraud, however, due to the high cost of the equipment it is being acquired in stages and its full implementation may take longer than desired. The ETCS was referred to as “one of the best under the World Customs Organization”. The system depends on reliable internet connectivity and calls on further investment in Information Computer Technologies.

5.5 An Evaluation of the Relationship between Customs and Industry

ZIMRA enjoys a cordial relationship with industry, which may be further enriched to allow healthier free exchange of information for the purpose of trade security and facilitation. Using a self-administered questionnaire, the researcher sought the opinion and perception of traders in their various categories on the use and effectiveness of the AEOs concept and a number of revelations emerged. The Zimbabwe Customs administration introduced the AEOs Concept in 2014. However, only a few companies have been granted the AEO status. Among the reasons given for the low uptake of the status were that the steps towards attaining the AEO status were not sufficiently publicised. Some traders, mainly in the SMEs professed ignorance about the existence of the status.

Traders in various categories were asked if the AEO facility was successfully implemented. It turned out that 75.7% of the informal traders were not aware of the existence of the facility while 72.2% of the 175 traders in the SME category were unaware of the AEO facility. More than 20% of traders in the informal and SMEs felt that the implementation of the AEO scheme was unsuccessful citing the low uptake.

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Conferring AEO status on a trader has the effect of encouraging compliance. The rationale is that there are certain advantages that accrue as a result of conferment of the status. Responses indicated that the AEO facility was mainly understood and embraced by large companies. The low uptake of AEO status by SMEs and informal enterprises signifies low cooperation and trust between them and ZIMRA.

<table>
<thead>
<tr>
<th>Success of Authorized Economic Operator by Category of Trader</th>
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<tbody>
<tr>
<td>Informal trader</td>
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<td><img src="image.png" alt="Graph" /></td>
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Own Research 2016

### 5.6 Capacity to Utilize Information for Trade Security and Facilitation

Various efforts have been made towards management of information with a view to enhance security. The CBM approach has been implemented in line with the World Trade Organization Trade Facilitation Agreement. The SW facility is central to the CBM approach, since it brings all information together on a single document. The process towards full implementation of the SW facility is still in the roll out stage. It is envisaged that with full implementation, all information pertaining to imports and exports will be captured on a single document. The Zimbabwe Customs and Excise Act (Chapter 23:04)\(^2\) was amended in 2016 to provide for new definitions relating to the SW concept, however the process of implementation involves harmonizing procedures and regulations among all agencies operating at the border. Traders mainly in the large companies’ category indicated that harmonizing procedures takes time and is likely to delay full implementation of the SW concept. The majority of traders in all

\(^2\) Government of Zimbabwe, 1996 *Customs and Excise Act, 1996* (Chapter 23:08), Harare: Printflow
categories gave complications associated with coordination amongst all relevant agencies as the reason for the delays in full implementation of the SW concept.

The OSBP concept has been embraced by EAC, SADC and COMESA. The OSBP concept has enabled more effective border control between Zambia and Zimbabwe, with joint controls and sharing of facilities. Generally, clearance procedures are shorter at the One at the Chirundu OSBP as demonstrated in the figure below, where the bulk of traders at Chirundu expressed satisfaction. The following are results showing satisfaction with time taken to clear consignments at four different borders.

![Satisfaction With Time Taken for Release of Goods by Ports](chart)

Own Research 2016

Respondents at the Chirundu border registered the highest rate of success in clearance turnaround times, which averaged one and a half hours in the commercial office according to traders’ responses. At Beitbridge border post turnaround times averaged eighteen hours in the commercial office. If turnaround times are shorter it allows brisk movement of consignments, allowing the Customs administration to focus on high-risk areas. The OSBP at Chirundu was financed externally because it involved costly infrastructural improvements. It may take time to implement the OSBP concept at other borders due to prohibitive costs associated with its setting up.

The advance cargo or passenger manifest is an approach recommended by the WCO under the SAFE Framework. The idea is to ensure that passengers and consignments stop for a minimal
time at the border. Respondents indicated that the system relies on Internet connectivity and may be compromised by erratic connectivity. However, it is effective in allowing Customs additional time for risk analysis and it should accelerate release of goods.

5.7 Corruption as a Deterrent to Trade Facilitation and Security

Despite the multiple measures in place to ensure trade security and facilitation corrupt tendencies will compromise the effectiveness of the measures. Grainger contends that government corruption should be removed in order to ensure trade security and facilitation. Customs administrations that are bureaucratic with complex, restrictive controls promote corruption, as the urge to evade regulations increases. There is need to simplify procedures so as to ensure that human contact is kept to a minimum.

6 RECOMMENDATIONS FOR SECURING AND FACILITATING TRADE IN EASTERN AND SOUTHERN AFRICA

Section 5 of the questionnaire gives all the categories of traders the opportunity to “provide solutions and recommendations for promoting trade facilitation”. The following recommendations are based on responses by all three categories of traders and also from literature reviewed.

It was suggested, mostly by traders in the formal sector that there should be a Business Process engineering exercise as a way of finding out the procedures and processes that are responsible for the delays. This will ultimately lead to the streamlining of trade procedures and cumbersome processes to do with physical examinations. It was suggested that although physical examinations mostly contributed to delays, a Business Process Engineering exercise would address the effect of all procedures that delay clearance.

The researcher contends that although the study is mostly based on the Zimbabwean context, the experiences may be generalized to fellow developing countries in East and Southern Africa, whose economies share the same challenges and opportunities of being former colonies whose economic activities are mainly primary industries largely hinged on extraction of minerals and production of basic commodities.

53 Andrew Grainger, “CUSTOMS AND TRADE FACILITATION: FROM CONCEPTS TO IMPLEMENTATION’2(1) WORLD CUSTOMS JOURNAL,17, 18
Literature reviewed suggests that strategic decisions taken by Customs administrations should take trade security and facilitation into consideration. The revenue collecting mandate of ZIMRA appears to take precedence over trade facilitation and security as is amply demonstrated by the quarterly financial reports.\textsuperscript{54} Customs administrations appear to be influenced by the line of thought of (Capaldo),\textsuperscript{55} in whose view trade facilitation is hallucination. It is not an easy task to convince some administrators of the importance of trade security and facilitation through risk management. The Kenya Revenue Authority’s Sixth Corporate Plan clearly emphasises the importance of risk management and includes it in every strategic decision. This should be instructive for all Customs administrations.

Traders recommended that risk profiling should extend to all aspects of a business, looking at ownership, business partners and level of compliance with other government departments. All Customs administrators are urged to share information with other government departments including private businesses. Risk management should conform to a consolidated approach. It would appear that efforts at station level are not well coordinated with efforts at regional and national levels.

While there have been efforts to curb transit fraud, it may be important to adopt the Transport Internationaux Routiers (TIR)\textsuperscript{56} Convention which facilitates movement of transit goods under Customs control from the country of export through transit countries to the country of destination. The TIR system ensures that the goods are not consumed in the transit countries without payment of duty. The measure may also be complemented with vibrant mobile anti-smuggling units. These measures should be combined with the establishment of Smart Corridors so as to improve infrastructure at border posts, use of the single manifest and full implementation of the Electronic Cargo Tracking System (ECTS) throughout the region.

Traders, mostly in the large companies’ category had positive comments about the AEO facility. In the opinion of the researcher, to reap more benefits the AEO facility may be complemented with an arrangement such as the Mutual Recognition Arrangement. This is important because trade across borders is international and the MRA gives insight in dealing


with consignments from other Customs administrations. Issues to do with security are international and therefore measures should be international.

CBM requires a border agency that has the overall role of bringing all the stakeholders together. It is difficult to bring all the stakeholders together because each organization has its own line of command and autonomy. Other countries are placing emphasis on the establishment of a National Ports Authority, a lead agency running the affairs of all ports of entry. The Zimbabwean government has made strides in coming up with MOU with South Africa for establishing the National Ports Authority, which when operational will be run under the Ministry of Transport and Infrastructure Development. The introduction of One Stop Border posts, particularly along the North South corridor will improve information exchange and enhance CBM since under the OSBP Customs administration work closely.

The idea of advance cargo and passenger manifests needs to be complemented with preclearance processing of documents. Having noted positive comments on the use of the advance cargo manifest by all traders, the researcher proposes that the advance cargo manifests facility be combined with separation of payment of duty and release of goods facility. Data should be submitted prior to arrival and consignments should be released immediately. This would also entail a process whereby consignments are released before payment of duty, based on the provision of a financial surety or insurance. This will also serve as an incentive for submitting an advance cargo manifest.

7 CONCLUSION
From the literature reviewed and responses by clearing agents a variety of trade facilitation and security measures were identified and assessed demonstrating that tremendous work has been done to secure and facilitate trade in the ESA region. There is, however, need to synchronise the experiences of individual countries to come up with a holistic package for the region. Whilst Mozambique and Kenya have fully embraced the Single Window concept, other ESA countries are still lagging behind or have not started at all. The One Stop Border Post is one concept that countries in the region can take a cue from the successes registered at Chirundu OSBP. Transit fraud has been a menace in many African countries and the region can benefit from implementing the Electronic Cargo Tracking System. Uganda has made significant strides in this regard whilst Zambia and Zimbabwe have followed suit. All the countries within the region may benefit from sharing experiences.
This paper concludes that the region has made significant progress in securing and facilitating trade. Many countries have made an effort in facilitating trade without compromising the security of the trade in terms of revenue collections and protection of the citizens from external threats. Whilst many countries in the region have not made significant progress in the ease of doing business index, there is hope that by facilitating and securing trade through a risk managed approach such kind of negativity can be eliminated.
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Appendix 1: Self-administered Questionnaire for traders

Data is for academic Purposes only and shall remain confidential

**Importers/Exporters Questionnaire**

- **Guidelines:** The Research Assistant should interview 250 x Importers and Exporters (Private and Commercial). This will involve seventy five (75) large companies, one hundred and seventy five (175) small to medium sized enterprises and one hundred (100) Informal traders.

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<td>1.1 Survey ID number</td>
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<td>1.3 Research Assistant name:</td>
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<td>1.4 Border post:</td>
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<td>1.7 Size of company</td>
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<td>2. Trade Facilitation Practices</td>
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</table>
| 2.1 Is information related to the requirements and procedures for clearing goods for import or export available in any form for your use? | 1. Yes  
2. No |
| 2.2 If yes, where can you access this information? | 1. Notice boards  
2. Pamphlets/brochures  
3. Newspapers/newsletters  
4. Internet  
5. Radios/Television  
6. Other (Specify).................. |
| 2.3 Are there any regular consultations between border agencies, traders and importers/exporters? | 1. Yes  
2. No |
| 2.4 Are importers/exporters (traders) and other interested parties consulted prior to introducing new or amended laws or regulations related to the movement, release and clearance of goods? | 1. Yes  
2. No |
| 2.5 State the laws that traders/exporters have been consulted on | 1)...............................................
2)................................................
3)................................................
4)................................................
5)..................................................

| 2.6 Have you made use of advance rulings for tariff classification and or, valuation and or origin of commodities at this border post? | 1. Yes  
2. No  
3. Don't know |
| 2.7 Are there any provisions made for appeal/review procedures? | 1. Yes  
2. No  
3. Don't know |
| 2.8 Do you know any traders/importers/exporters who have appealed for a review on their goods in the past 3 months? | 1. Yes  
2. No |
2.9 Has the Authorized Economic Operator (AEO) concept been successfully implemented

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<th>2. No</th>
<th>3. Don’t know</th>
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2.10 Have you ever appealed for a review in the past 3 months?

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2.11 Is there coordination of border activities to facilitate trade between ZIMRA authorities and other agencies (Stakeholders) (Police, Immigration, Agriculture, Health, VID)/ members with whom they share the border with, with regards to:

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Read out (a) to (e) and record answers

- a) Alignment of working days and hours and border opening hours between stakeholders at the Port of Entry
- b) Alignment of procedures and formalities (Data harmonization and document alignment between borders)
- c) Development and sharing of common facilities (sharing of common facilities, such as buildings and verification sheds between borders)
- d) Joint controls (e.g. do joint inspections occur when necessary)
- e) Establishment of one stop border post control
2.12 Are procedures simplified and mainstreamed to ensure that information that has already been supplied via the single window should not be asked for again by another border agency participating in the single window?

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2.13 Are processes sufficiently automated/ electronic (i.e. Computerised?)

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2.14 Are pre-shipment inspections carried out by private companies to check on quality, quantity and values before export?

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2.15 Are there any consular transactions or any related fee or charges, on importations?

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2.16 How long does it normally take for your goods to be cleared and released? **Please record in hours. Convert days into hours (e.g. 3 days would be 3X24=72)**

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2.17 Explain the causes of the delays with regards to the release and clearance of goods.

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2.18 Are you charged the same amount to clear similar goods each time you import/export goods at the border?

|       | 1. Yes (skip to 2.19) |
|       | 2. No (proceed to 2.18.1) |

2.18.1 (If no to 2.18) what are the reasons for the differences in duties charged on similar goods? **If the reasons are not known, record ‘Do not know’**

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<td>4) Do Not Know</td>
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2.19 At what points were you charged for your consignment?

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| 2.20 Did you receive a receipt for all payments that you made at all the points? | 1. Yes  
2. No                                       |
| 2.21 Are there any borders or entry ports that you prefer to use       | 1. Yes  
2. No  
If yes state the reason(s)                                      |
|                                                                         | .................................................................. |
|                                                                         | .................................................................. |
| 2.22 Besides ZIMRA, are there any other organisations/ministries/departments that you had to visit before your goods had to be cleared? | 1. Yes  
2. No  
If so, state the number.................................................. |
|                                                                         | .................................................................. |
| 2.23 List the organisations/ministries/departments                      | 1).................................................................. |
|                                                                         | 2).................................................................. |
|                                                                         | 3).................................................................. |
|                                                                         | 4).................................................................. |
|                                                                         | 5).................................................................. |
| 2.24 Are all these organisations/ministries/departments at this border post? | 1. Yes  
2. No                                       |
| 2.25 If not what is the distance for the furthest organisations/ministries/departments | Distance in kilometres................................. |
| 2.26 Are customs clearance documents and procedures simple enough to be understood by clients? | 1. Yes  
2. No  
If no, please identify any complicated documents and procedures/process  
1).................................................................. |
|                                                                         | 2).................................................................. |
|                                                                         | 3).................................................................. |
|                                                                         | 4).................................................................. |
| 2.27 Have you ever used the preclearance procedures                     | 1. Yes  
2. No                                       |
| 2.28 If yes was the preclearance process completed before the arrival of the goods | 1. Yes  
2. No                                       |
| 2.29 If yes did the preclearance procedure shorten your clearance time  | 1. Yes  
2. No                                       |
### 2.30 Is the infrastructure at the border posts and other ports of entry adequate (i.e waiting areas, rest rooms, holding areas for goods, room for free movement/passageway for traffic….etc…)  
1. Yes  
2. No  
If no explain the constraints  
…………………………………………  
………………………………………

### 2.31 Inspections are too physical at ports of entry there should be more non-intrusive methods of inspection (scanners, risk profiling through gathering information etc..)  
1. Yes  
2. No

### 3. Satisfaction

3.1 Indicate your level of satisfaction with regards to:

| a) Time taken for the release of goods | 1. Very satisfied  
2. Satisfied  
3. Somewhat satisfied  
4. Not satisfied  
*If somewhat or not satisfied explain*  
…………………………………………  
……………………………………… |

| b) Costing structure (charges) for goods imported/exported (in relation to taxes and duties) | 1. Very satisfied  
2. Satisfied  
3. Somewhat satisfied  
4. Not satisfied  
*If somewhat or not satisfied explain*  
…………………………………………  
……………………………………… |

| c) Attitude and service delivery of custom officials | 1. Very satisfied  
2. Satisfied  
3. Somewhat satisfied  
4. Not satisfied  
*If somewhat or not satisfied explain*  
…………………………………………  
……………………………………… |

### 4. Challenges and Opportunities
| 4.1 Are there any challenges that you have faced at this border post? | 1. Yes  
2. No |
|---|---|
| 4.2 List at most 5 challenges | 1).................................  
2).................................  
3).................................  
4).................................  
5)................................. |
| 4.3 What are the areas where free flow of trade is constrained at ports of entry? (physical examinations, payments, valuations, documentary checks etc) | 1).................................  
2).................................  
3).................................  
4).................................  
5)................................. |
| 4.4 What are the existing contradictions, inconsistencies and complexities in trade facilitation policies that may lead to extra costs and delays for traders? | 1).................................  
2).................................  
3).................................  
4).................................  
5)................................. |
| 4.5 List at most 5 opportunities/best practices that you can identify at this border post | 1).................................  
2).................................  
3).................................  
4).................................  
5)................................. |
| **5. Solution/Recommendation to promote trade facilitation practices** | |
| 5.1 Based on the challenges that you mentioned, what do you think can be done to improve trade facilitation practices? | 1).................................  
2).................................  
3).................................  
4).................................  
5)................................. |
| 5.2 Which short term recommendations can be used to enable implementation of trade facilitation policies at Zimbabwe’s ports of entry? | 1).................................  
2).................................  
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4).................................  
5)................................. |
5.3 Which long term recommendations can be used to enable implementation of trade facilitation policies at Zimbabwe’s ports of entry?

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6. Benefits realized from trade facilitation practices

6.1 What are the benefits that you have realised from the existing trade facilitation practices?

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7. Any other comments