Stakeholder meeting on Non-Tariff Measures

NTM Business Survey in Pakistan 2019
What is ITC?

**UNCTAD**
The UN body for design of policy recommendations to achieve economic and social development through trade and investment.

**WTO OMC**
The forum to negotiate multilateral trade rules, monitor their implementation and handle trade disputes

ITC works with local and regional institutions and businesspeople to build trade capacity.

Our mission

To foster inclusive and sustainable growth and development through trade and international business development.
ITC’s focus areas and goals

**FOCUS AREAS**

- Providing trade and market intelligence
- Building a conducive business environment
- Strengthening trade and investment support institutions
- Connecting to international value chains
- Promoting and mainstreaming inclusive and green trade
- Supporting regional economic integration and South-South links

TRADE-RELATED NEEDS

- Trade and investment support institutions
- Small and medium-sized enterprises
- Policymakers

SME international competitiveness

THE GLOBAL GOALS
For Sustainable Development
ITC Market Analysis – Areas of work

Global Public Goods:
- Trade Map
- Market Access Map
- Investment Map
- Standards Map
- Procurement Map
- Rules of origin facilitator
- Global Trade Helpdesk
- ePing

Capacity Building:
- Using tools & research methods to analyse markets

Country & Regional Diagnostics/Studies:
- Country surveys
- Studies of trade potential & market access issues
Today’s objective

Present first results of the survey

Get inputs from the public institutions

Discuss jointly with the public and private sector to identify and prioritize necessary action plan
Opening remarks (09:00)

Session 1 Background and overviews of results
- Overview on ITC project on non-tariff measures (NTMs) and implementation of survey in Pakistan
- Results of the survey: companies’ perception on NTMs

Session 2 Thematic round tables
- Round table 1: Technical requirements, standards and conformity assessment.
- Round table 2: Rules of origin, customs procedures and other clearance issues
Understanding Non-Tariff Measures
What are non-tariff measures (NTMs)?

Official policy measures on export and import, other than ordinary customs tariffs, than can potentially have an effect on international trade in goods, changing quantities traded, or prices or both.

Mandatory requirements, rules or regulations legally set by the national authorities of the exporting, importing or transit country (in contrast to private standards which are not legally set)

Can affect both export and import

Include technical measures and standards, as well as regulations on customs procedures, para-tariff measures, financial measures, prohibition, etc.
Classification of NTMs

- International taxonomy used to classification different types of regulations related to trade in goods.

- Prepared in a multi-agency framework

- Covers
  - mandatory, government-imposed regulations:
  - both import and export of goods
  - technical and non-technical measures

- Trade in services not covered
A. – O. **Import**-related measures

A. Technical requirements
B. Conformity assessment
C. Pre-shipment inspection and other entry formalities
D. Trade remedies (anti-dumping, countervailing and safeguards)
E. Quantity control measures (e.g. licences, quotas, prohibitions)
F. Charges, taxes and price control measures
G. Finance measures

H. Anti-competitive measures
I. Trade-related investment measures
J. Distribution restrictions
K. Restriction on post-sales services
L. Subsidies
M. Government procurement restrictions
N. Intellectual property
O. Rules of origin and related certificate of origin

P. **Export**-related measures

Technical measures (product related)
Non-technical measures (trade-related)
ITC NTM Survey: NTMs and other trade obstacles

**NTMs**
Official regulations on trade other than ordinary customs tariff, that can potentially have an effect on international trade in goods, changing quantities traded, or prices or both.

**Private Standards**
Additional voluntary, non-public standards demanded by buyers for a variety of purposes including quality, social, environmental and ethical reasons.

**Excessively strict/complex requirements**
The requirements are too strict or complex to comply with.

**Procedural Obstacles**
Practical challenges or administrative hurdles which make compliance to NTMs difficult.

**Business Environment**
Obstacles that are not related to NTMs but hinder international trade.
ITC’s Programme on NTMs
Motivation, projects and methodology
ITC’s Programme on Non-tariff measures

**Pillar 1**
NTM Regulatory Mapping

- Codifying and classification of national trade-related regulations
- Data dissemination through Market Access Map (MAcMap)

**Pillar 2**
Business Surveys

- Large-scale surveys of businesses on their experiences with government regulations when exporting or importing

**Pillar 3**
Solution Packages

- Design and implementation of actions to address companies’ difficulties with NTMs
  - E.g.: Trade Obstacle Alert (TOA) mechanism
# Surveys Methodology: Scope

## Goods
- Covers companies involved in international trade in goods.
- Products from all sectors included except minerals and arms.
- Sectors with more than a 2% share in total exports are included.
- Cumulatively, sectors covered account for at least 90% of country’s total export value.

## Services
- The survey *does not cover* companies involved in cross-border trade in services such as tourism, banking, finance, telecommunication and BPO.
- A survey on trade in services requires a different methodology.

## NTM Survey covers the following sectors:

1. Fresh food and raw agro-based products
2. Processed food and agro-based products
3. Wood, wood products and paper
4. Yarn, fabrics and textiles
5. Chemicals
6. Leather
7. Metal and other basic manufacturing
8. Non-electric machinery
9. Computers, telecommunications; consumer electronics
10. Electronic components
11. Transport equipment
12. Clothing
13. Miscellaneous manufacturing
Two-step interview process

**Step 1**
Phone Screens (PS)
- 6-8 min per interview
- Identify products exported by the company and partner countries
- Identify if the company face problems with burdensome regulations

**Step 2**
Face-to-Face interviews (FTF)
- Companies facing problems with NTMs as identified in PS interviewed
- 40-60 min per interview
- All details of the problem faced by the company recorded
Type of data: Telephone interviews

1. Phone screen data gathering company level information (representative sample by sector) on:

   - Main exported/imported product (HS6)
   - Destination/origin markets (at region level)
   - Number of employees
   - Whether or not an obstacle is faced
   - Gender information (firm management / ownership / employment)
2. Face-to-face data gathering company-level information (only those facing trade obstacles) on:

- All affected trade flows
- Burdensome regulations (description, official name, category of NTM, implementing body, applying country)
- Recommendations to overcome the obstacles
- All traded products and partner countries
- Related obstacles (description, category of obstacles, implementing agency, location)

Where the problem occurs
NTM Business Surveys in numbers

30,000 Phone Interviews
8,600 Face-to-face interviews
More than 30,000 reported trade obstacles
From over developing countries 40
+ 28 EU countries

More than 185 concerning trade with partner countries

Complete
Ongoing or Planned

TRADE IMPACT FOR GOOD
Survey Implementation in Pakistan

Profiles of interviewed companies
In close collaboration with national and international partners

GALLUP PAKISTAN
Survey Implementation Partners

GOVERNMENT OF PAKISTAN
MINISTRY OF COMMERCE

Australian Government
Department of Foreign Affairs and Trade

THE WORLD BANK
IBRD • IDA • WORLD BANK GROUP

ITC

TRADE IMPACT FOR GOOD
NTM Survey Implementation: Timeline

**February 2019**
- Training of Gallup interviewers by ITC staff.

**March 2019 – June 2019**
- Survey implementation
- 1100 companies surveyed and interviewed

**May 2019 – July 2019**
- Quality control of data
- Data analysis
- First analysis of data

**September 2019**
- Publication of the report “Pakistan: Company Perspectives. An ITC Series on NTMs”.
- Initiation of follow up activities

**17 July 2019 (Today)**
- Stakeholder meeting in Islamabad to discuss main findings and policy options
- Public sector inputs to the report

**July – August 2018**
- Additional research and drafting of report
- Consultation with public sector and experts
- Design of follow up activities
Why a survey in Pakistan? And for whom?

Who will benefit from the ITC survey on NTMs:

1. Exporters
   • Channel for reporting the obstacles to trade they face in their daily business to raise awareness among other exports and importers, trade support institutions and policy makers
   • Exchange of experiences with other exporters and importers
   • → final beneficiaries of removal of NTM-related trade obstacles

2. Trade support institutions
   • Better understanding of sector-specific needs;
   • Better support for business sector; fostering of transparent and dynamic commercial activity

3. Policy makers
   • Understanding specific needs of business sector; better formulation of national and regional strategies and policies
   • Removal of procedural obstacles

4. Researchers
   • Better understanding of the impact of NTMs on international trade – from the perspective of the business sector
Things to keep in mind

• Information collected from the survey is perception data
  • Respondents may have different scale for judging what constitutes an impediments.
  • Perceptions across countries can differ due to cultural, political, social, economic and linguistic differences.
• Companies may not have full understanding of the purpose of the regulation
• Scope of the survey limited to legally operating companies
  • Informal trade not covered
Objectives of the survey

The NTM survey

…studies the private sector perspective on NTM-related trade obstacles with a view to identify feasible options to overcome these.

…is per definition “biased” as it concentrates on the company perspective. In the analysis of survey results, the views of additional stakeholders will however be sought and taken into account.

…aims at identifying concrete actions that enable Pakistan to reach greater efficiency in the export process and reduced trade cost.

The NTM survey is NOT

…a collection of or platform for complaints.

…intended to single out specific institutions to blame for inefficiencies.
Survey Implementation

• Survey implemented in Pakistan by:

• Survey Questionnaire has 5 sections:
  ➢ **Basic information**
  ➢ **Business operation** – questions about the company
  ➢ **Main products and partner countries** – products export/import and the origin and destination country or countries
  ➢ **Barriers to Trade** – challenges faced with certain regulations or procedures
  ➢ **Business environment** – problems with business environment

• Questionnaires in English and Urdu

• All interviews conducted in English and Urdu

• Extensive training to the Field Teams – given by ITC in February 2019

• Quality control of data – done by ITC
Results validation / stakeholder consultation

• The survey documents company experiences with NTMs → one side of the story

• This is complemented by stakeholders consultations, including
  - Public agencies (customs, standard agency, etc.)
  - Business associations
  - Development agencies

• Data quality control and analysis in collaboration with national experts

• Validation of results during a national stakeholder meeting

• Publication of survey findings

• Preparation for activities to tackle the challenges identified – in close collaboration with the Government of Pakistan and other development partners
NTM Survey in Pakistan: Sample

~12000 Active exporting companies in Pakistan in 2019

~1200 Companies interviewed by phone

~300 Companies interviewed face-to-face
Business Directory: By sector and location

Company contacts obtained from:
- Trade Development Authority of Pakistan: TDAP

Additional contacts sourced from:
- Various business associations and chambers of commerce
Location of interviewed companies

Over 20 cities and towns covered

Bahawalpur  Faisalabad
Gujranwala  Gujrat
Islamabad  Jhang
Karachi  Khairpur
Lahore  Lasbela
Multan  Okara
Peshawar  Quetta
Rawalpindi  Sahiwal
Sargodha  Sheikhupura
Sialkot  Sukkur
Pakistan NTM Business Survey

Companies interviewed

Stage 1: Phone Screening
- Exporters: 797
- Importers: 152
- Both: 265

Stage 2: Face-to-Face
- Exporters: 218
- Importers: 2852
- Both: 298
Pakistan NTM Survey: Company Profiles

- Exporters: 66%
- Importers: 12%
- Company Both Exports And Imports: 22%
Pakistan NTM Survey: Company Profile

Does your company produce the good it exports?

Yes: 78%
No: Company only trade products 22%
Pakistan NTM Survey: Company Profile

Most Pakistani exporters take care of the export procedures on their own.

Who deals with the export process?

- 75% Company itself
- 10% Company itself + Specialized forwarding company
- 6% Specialized forwarding company
- 1% Partner company abroad
- 8% Unspecified

Company itself
Distribution of interviewed companies by size

Company size determined based on the number of employees.

- **Small**: Up to 50 employees
- **Medium**: Up to 250 employees
- **Large**: +250 employees

- Small: 61%
- Medium: 18%
- Large: 9%
- n/a: 12%
Exporters’ main export destination: by sector

**Manufacturing**
- Asia (ex. SAARC): 24%
- Europe: 13%
- Asia (ex. SAARC): 46%
- SAARC: 2%
- North America: 10%
- Africa: 2%

**Agro - Food**
- Asia (ex. SAARC): 52%
- Europe: 22%
- Asia (ex. SAARC): 19%
- SAARC: 2%
- North America: 8%
- Africa: 2%
Company Profile: Women Employment

Employees in trading companies are female

- Small: Up to 50 employees (2% female)
- Medium: Up to 250 employees (8% female)
- Large: +250 employees (13% female)

Small: Up to 50 employees
Medium: Up to 250 employees
Large: +250 employees
Company Profile: Women Employment

- **61%** Companies employed no women
- **80%** Companies with less than 10% of their workforce women
- **1%** Companies with more female employees than men

TRADE IMPACT FOR GOOD
Company Profile: Women in leadership position

- Company owned by woman: 6%
- Company managed by woman: 4%
- n/a: 4%

86%
Aggregate results
Trade barriers affecting Pakistani exporters
**Existing Literature (1/2)**

Rank of Pakistan out of 190 countries on Ease of Trading Across Borders

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Pakistan (Lahore)</th>
<th>South Asia</th>
<th>OECD high income</th>
</tr>
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<tbody>
<tr>
<td>Time to export: Border compliance (hours)</td>
<td>75</td>
<td>62.9</td>
<td>12.5</td>
</tr>
<tr>
<td>Cost to export: Border compliance (USD)</td>
<td>356</td>
<td>347.2</td>
<td>139.1</td>
</tr>
<tr>
<td>Time to export: Documentary compliance (hours)</td>
<td>55</td>
<td>74.1</td>
<td>2.4</td>
</tr>
<tr>
<td>Cost to export: Documentary compliance (USD)</td>
<td>118</td>
<td>160.3</td>
<td>35.2</td>
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<tr>
<td>Time to import: Border compliance (hours)</td>
<td>120</td>
<td>95.8</td>
<td>8.5</td>
</tr>
<tr>
<td>Cost to import: Border compliance (USD)</td>
<td>476</td>
<td>504.6</td>
<td>100.2</td>
</tr>
<tr>
<td>Time to import: Documentary compliance (hours)</td>
<td>143</td>
<td>100.8</td>
<td>3.4</td>
</tr>
<tr>
<td>Cost to import: Documentary compliance (USD)</td>
<td>250</td>
<td>276.7</td>
<td>24.9</td>
</tr>
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</table>

Source: World Bank Doing Business
### Pakistan 122nd / 136

**Performance Overview**

<table>
<thead>
<tr>
<th>Component</th>
<th>Rank / 136 Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Enabling Trade Index</td>
<td>122</td>
</tr>
<tr>
<td>Subindex A: Market access</td>
<td>128</td>
</tr>
<tr>
<td><strong>Pillar 1: Domestic market access</strong></td>
<td>133</td>
</tr>
<tr>
<td><strong>Pillar 2: Foreign market access</strong></td>
<td>101</td>
</tr>
<tr>
<td>Subindex B: Border administration</td>
<td>105</td>
</tr>
<tr>
<td><strong>Pillar 3: Efficiency and transparency of border administration</strong></td>
<td>105</td>
</tr>
<tr>
<td>Subindex C: Infrastructure</td>
<td>99</td>
</tr>
<tr>
<td><strong>Pillar 4: Availability and quality of transport infrastructure</strong></td>
<td>70</td>
</tr>
<tr>
<td><strong>Pillar 5: Availability and quality of transport services</strong></td>
<td>64</td>
</tr>
<tr>
<td><strong>Pillar 6: Availability and use of ICTs</strong></td>
<td>124</td>
</tr>
<tr>
<td>Subindex D: Operating environment</td>
<td>130</td>
</tr>
<tr>
<td><strong>Pillar 7: Operating environment</strong></td>
<td>130</td>
</tr>
</tbody>
</table>

### The Global Enabling Trade Report 2016

#### Most problematic factors for exporting

- Access to trade finance: 15.6
- Identifying potential markets and buyers: 15.5
- Inappropriate production technology and skills: 11.8
- Technical requirements and standards abroad: 9.5
- Difficulties in meeting quality/quantity requirements of buyers: 8.9
- Access to imported inputs at competitive prices: 8.8
- Tariff barriers abroad: 7.1
- High cost or delays caused by domestic transportation: 6.1
- High cost or delays caused by international transportation: 6.1
- Rules of origin requirements abroad: 4.5
- Burdensome procedures at foreign borders: 4.2
- Corruption at foreign borders: 1.8

Understanding companies’ difficulties with NTMs: Three aspects

**Affectedness**
How many and which companies face difficulties

**Type and Intensity**
Which NTMs are experienced as challenging

**Cause**
Why NTMs are burdensome

Insights on how to reduce NTM-related trade cost without undermining legitimate objectives that regulations serve
Share of Pakistani companies facing difficulties with NTMs

<table>
<thead>
<tr>
<th></th>
<th>Export</th>
<th>Import</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affected</td>
<td>53%</td>
<td>61%</td>
</tr>
<tr>
<td>Not Affected</td>
<td>47%</td>
<td>39%</td>
</tr>
</tbody>
</table>

Share of companies affected by NTMs across different regions:

- West Africa (ECOWAS): 73%
- East Africa: 64%
- Asia: 47%
- Arab States: 44%
- South America &...: 42%
Share of Pakistani exporters facing difficulties with NTMs

Affected exporters

- 53% of exporters surveyed faced difficulties with NTMs.

Source: ITC Business Survey in Pakistan (2019)

- 62% of fresh food exporters encountered NTMs.
- 52% of processed food exporters faced NTMs.
- 50% of clothing exporters were affected.
- 49% of textile products exporters faced NTMs.
- 45% of leather products exporters encountered NTMs.

Trade Impact For Good
What are the origins of burdensome NTMs that exporters face?

Share of the reported burdensome NTMs that are applied by partner countries and Pakistan

- 55% Foreign regulations
- 45% Pakistani regulations
Results from NTM Business Surveys in other Asia-Pacific Countries

6455 Companies interviewed

9 Asian countries

NTM Business Surveys in The Asia-Pacific Region
NTM Survey in other Asia-Pacific countries

Share of burdensome NTMs applied by partner and home country

Destination or Transit country (80%)

Home (20%)

Foreign regulations

Domestic regulations
Most of the NTMs perceived as burdensome are Asian and European regulations and procedures.

Share of burdensome NTMs applied by partner country and Pakistan:

- Foreign regulations: 55%
- Pakistan: 45%

Burdensome NTMs applied by partner countries:

- SAARC: 5%
- Asia (excl. SAARC): 12%
- Europe: 24%
- North America: 18%
- Rest of the world: 10%

Share of Pakistan’s export to the region (2017):

- Asia (excl. SAARC): 18%
- Europe: 24%
- North America: 5%
- Rest of the world: 12%
Types of NTMs faced by exporters

- Technical requirements: 46%
- Conformity assessment: 3%
- Pre-shipment inspection and border clearance: 42%
- Quantity control measures: 3%
- Charges, taxes and price control measures: 3%
- Finance measures: 3%
- Anti-competitive measures: 3%
- Rules/Certificate of origin: 3%
- Export related measures (Pakistani Regulations): 3%
Types of NTMs faced by exporters: by sector

- Technical requirements
- Pre-shipment inspection and border clearance
- Charges, taxes and price control measures
- Price control measures
- Subsidies
- Export related measures.

- Conformity assessment
- Quantity control measures
- Finance measures
- Anti-competitive measures
- Rules/Certificate of origin

Agriculture: 34% (2% Technical requirements), 62% (other measures)

Manufacturing: 54% (other measures), 27% (Conformity assessment), 6% (Rules/Certificate of origin)
Types of NTMs applied by Pakistan

45% of reported burdensome NTMs by exporters are Pakistani regulations

- Export inspection: 39%
- Certification required by the exporting country: 34%
- Export prohibitions: 12%
- Export quotas: 3%
- Licensing or permit to export: 1%
- Export registration: 2%
- Export taxes and charges: 4%
- Export price control measures: 3%
- Export tax refund: 1%
- Other export technical measures: 2%
Why exporters find NTMs burdensome

Procedural hinderances is a major concern to exporters that make compliance to regulations difficult.

Because of related Procedural Obstacles (PO)

14% Regulatory obstacles (regulations too strict or difficult to comply with)

71% Both regulatory and procedural obstacles
Where do the Procedural Obstacles (POs) occur?

- Destination
- Pakistan

13% 87%
Types of POs experienced by exporters

- **31%** due to delays in administrative procedures
- **28%** High fees and charges
- **13%** Lack of appropriate facilities

**Categories of POs**

- Delay related to reported regulation
- High fees and charges for reported certificate/regulation
- Informal payment
- Limited/inappropriate facilities for testing
- Other limited/inappropriate facilities, related to reported certificate/regulation
- Limited/inappropriate facilities for sector-specific transport and storage
- Information on selected regulation is not adequately published and disseminated
- Other procedural obstacles

**Number of PO cases**

- **Pakistan**
- **Partner country**

*ITC*
Types of NTMs faced by importers

- Technical requirements: 30%
- Conformity assessment: 18%
- Pre-shipment inspection and border clearance: 1%
- Trade remedies: 3%
- Quantity control measures: 6%
- Charges, taxes and price control measures: 4%
- Finance measures: 37%
- Anti-competitive measures: 4%
## Companies’ perception on general business environment in Pakistan

### How the business environment conditions have changed in the last 5 years

<table>
<thead>
<tr>
<th>Perception</th>
<th>Improved</th>
<th>Remained the same</th>
<th>Deteriorated</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lack of electronic/computerized procedures</td>
<td>81%</td>
<td>14%</td>
<td>5%</td>
</tr>
<tr>
<td>Other technological constraints</td>
<td>72%</td>
<td>20%</td>
<td>7%</td>
</tr>
<tr>
<td>Problems with electricity supply</td>
<td>59%</td>
<td>28%</td>
<td>13%</td>
</tr>
<tr>
<td>Low security level for persons and goods</td>
<td>52%</td>
<td>29%</td>
<td>19%</td>
</tr>
<tr>
<td>Limited transportation system</td>
<td>50%</td>
<td>29%</td>
<td>21%</td>
</tr>
<tr>
<td>Complex clearance mechanism</td>
<td>41%</td>
<td>44%</td>
<td>15%</td>
</tr>
<tr>
<td>Lack of accredited testing laboratories</td>
<td>38%</td>
<td>40%</td>
<td>22%</td>
</tr>
<tr>
<td>Limited or lack of access to trade finance services</td>
<td>34%</td>
<td>40%</td>
<td>25%</td>
</tr>
<tr>
<td>Lack of human resources in the agencies</td>
<td>34%</td>
<td>40%</td>
<td>26%</td>
</tr>
<tr>
<td>Road blocks and checkpoints</td>
<td>32%</td>
<td>46%</td>
<td>21%</td>
</tr>
<tr>
<td>Poor intellectual property rights protection</td>
<td>29%</td>
<td>55%</td>
<td>16%</td>
</tr>
<tr>
<td>Lack of access to information, no enquiry point</td>
<td>29%</td>
<td>56%</td>
<td>16%</td>
</tr>
<tr>
<td>Lack of storage facilities, including cooling</td>
<td>27%</td>
<td>50%</td>
<td>23%</td>
</tr>
<tr>
<td>Inconsistent/arbitrary behavior of officials</td>
<td>26%</td>
<td>40%</td>
<td>34%</td>
</tr>
<tr>
<td>Corruption</td>
<td>26%</td>
<td>40%</td>
<td>30%</td>
</tr>
<tr>
<td>Need to hire a local customs agent to get clearance</td>
<td>25%</td>
<td>46%</td>
<td>30%</td>
</tr>
<tr>
<td>Time delays</td>
<td>22%</td>
<td>37%</td>
<td>41%</td>
</tr>
<tr>
<td>Lack of access to inputs for production</td>
<td>21%</td>
<td>60%</td>
<td>19%</td>
</tr>
<tr>
<td>Excessive or very expensive weighbridges</td>
<td>20%</td>
<td>60%</td>
<td>19%</td>
</tr>
<tr>
<td>Problems with conditions imposed by partner</td>
<td>19%</td>
<td>44%</td>
<td>36%</td>
</tr>
<tr>
<td>Lack of accessible business oriented legal support</td>
<td>16%</td>
<td>44%</td>
<td>36%</td>
</tr>
<tr>
<td>Ineffective legal enforcement</td>
<td>14%</td>
<td>67%</td>
<td>19%</td>
</tr>
<tr>
<td>Limited or extremely expensive airline tickets</td>
<td>13%</td>
<td>70%</td>
<td>19%</td>
</tr>
</tbody>
</table>
Concerns of agricultural sector

Difficulties with foreign regulations and requirements
Fruits and Vegetables

1. **Maximum residue limit (MRL) testing / certifications**
   - Pakistan Council of Scientific and Industrial Research (PCSIR) labs issues MRL certification in Pakistan.
   - Small exporters find the fees high (>PKR 25000). High costs especially when some countries require certificates for each containers.
   - It also takes several days to get this MRL certificate - concerns due to perishability of the products.

2. **Phyto-sanitary certificate issued by the Department of Plant Protection (DPP)**
   - DPP officials have first to make field visits to check the quality of the products.
   - Long waiting time to DPP officers to come inspect.
   - Companies feel that this is due to inadequate number of officers at DPP.

3. **Difficulties to get hot water or irradiation treatment in Pakistan**
   - Requirement of many importing countries that mangoes should be hot water treated. Limited facilities are available in Pakistan to undergo these treatments.
4. **Conditions attached to duty free import of corrugated boxes**
   - Exporters benefit from duty free import of corrugated boxes with a condition that these be utilized within 12 months.
   - As the season of Kinnow and mango are for a limited period limited, unused boxes can result in exporters facing additional costs.

5. **Manual export inspection and lack of cold storages**
   - Manual inspection at the customs due to inadequate scanners is an issue for exporters, in particular exporters of fresh food “perishable products”. Manual inspection can be a lengthy process.
   - Unpacking and repacking of boxes can take a long time.
   - Insufficient cold storage facilities is a concern

6. **Constraints at the production level also needs to be addressed**
   - Cost of production, plant diseases and quality issues (Fruit Fly, Thyrips, blemish, etc.), water constraints, insufficient information about demand in the international market, high air freight cost, availability of quality seed and adoption of modern technology.

7. **Export restriction of certain products:**
   - Eg: Chillies, bitter gourd, eggplant, citrus, guava.
   - Quality related
1. **Difficulties to get the required minimum residue limit (MRL) certificates**
   - Pakistan Council of Scientific and Industrial Research (PCSIR) issues MRL certification but is not able to cover all parameters on MRL testing.
   - Some countries require MRL analysis on parameters not covered by PCSIR.
   - Samples have to be sent abroad (usually US or EU) for necessary analysis.
     - Additional cost and time

2. **Tests for Genetically Modified Organism (GMO)**
   - Lack of suitable labs in Pakistan to undergo this test.
   - Samples sent abroad for testing.
4. **Exporting to USA is an expensive process**
   - FDA certification mandatory.
   - High fee and validity for one year only.

5. **Third party inspection required by some countries lead to additional cost for exporters.**

6. **Concerns due to export inspection**
   - Delays in shipment process – waiting time can be upto 10 days
   - Damaged packaging
   - Unhygienic conditions at warehouses where the packages are opened

7. **Some instances of certification provided by Pakistani labs not being recognized**
   - Eg: in China and Malaysia
   - Exporters usually have to go under go additional test
Meat

1. **High antibiotics residues**
   - Some meat exporters use antibiotics in their production.
   - High antibiotic residues in the final product have resulted in unpleasant experiences and reputational loss.

2. **Difficulties to get Halal certification**
   - Exporting to GCC countries require Halal certification.
   - Fragmentation of halal certification laboratories in Pakistan. Different importing markets asks for a distinct halal certification from specific laboratory, which imposes an extra burden on exporter to acquire several halal certificates.

3. **Health certificate for exports**
   - The certificate issued by the Animal Quarantine Department in Pakistan is only accepted in some of the neighbouring countries.
   - Otherwise, countries like Canada and UAE do not recognize this certificate and ask to visit the slaughterhouses in Pakistan before allowing the entry of the product into their countries.

4. **Export to EU and the US not realized due to strict meat traceability requirement**

5. **Lack of sufficient cold storage facilities in the airports and customs points.**
European requirement for Carpets to use AZO free dyes.
• European regulation
• Azofree dyes are becoming available in Pakistan but they are not readily available

Partner countries requires use of new environmentally friendly dyes
• These dyes are not readily available in Pakistan and importing them is expensive

To exporting towels to Europe, various certification such as OCO certificate, SA1400, BSCI is required.
• High costs of certificates with validity for these is only one year.

Pakistani carpets facing high tariff walls:
• For eg from China (inspite of the FTA), Turkey, Brazil, Russia
Textiles & Garments

Increasing number of certifications requirement for exports to EU and US.
• Costs are high to get all the required certificates
• Not all the tests can be done in Pakistan

Restriction on sending samples (Carpets)
• Weight limit of 12 kg
• Handmade carpets are usually heavy
• Payment required for “samples” that are heavier than 12 kg

Delays in receiving export subsidies (Woven fabrics)

Foreign exchange regulations
Surgical instruments

Obtaining certification (e.g. FDA, ISO, ICE, MDR) required for exports is costly
Difficulties at the customs

- **Challenges related to customs valuation:**
  - Ambiguity among Pakistani companies on how customs officials determine the customs value of imported goods.
  - Customs surcharges (regulatory duties) imposed by the government on import of raw materials.
  - When the shipment is rejected abroad, customs in Pakistan imposes import tax on returned goods.

- Lack of adequate facilities at the customs such as warehouses and cold storages.

- Long delays and complaints about handling of goods during inspection.
Other issues

• The **process of tax refund** is tedious and complicated. Despite providing all required documents, it can take several years to get the refund.

• **Advance payments restriction** is a real hindrance for Pakistani companies importing raw materials. According to the State Bank of Pakistan (SBP) regulations, traders are only allowed to make an advance payment up to $10,000. This restriction is affecting Pakistani exporters who are unable to import the required raw materials.

• Due to fear of inability to meet high-quality requirements, the government of Pakistan **banned the exports** of many agriculture products, including fruits and vegetables.

• **Compulsory use of National Logistics Cell (NLC) trucks.** There is limited availability of national trucks and containers which causes long delays and high costs.
Difficulties of women entrepreneurs

- In general, women participation in exporting businesses is low.
- Women not yet able to achieve export success
  - Women businesses operate in informal sectors and on a much smaller-scale.
- Key challenges
  - Lack of access to trade-related information and market demands
  - Lack of access to Trade Finance
  - Lack of information on trade procedures and logistics.
  - Lack of information on government incentives for women entrepreneurs
### Main burdensome NTMs reported by importers

<table>
<thead>
<tr>
<th>Measure</th>
<th>Share</th>
</tr>
</thead>
<tbody>
<tr>
<td>GD0. Regulations concerning terms of payment for imports</td>
<td>31%</td>
</tr>
<tr>
<td>FD0. Customs surcharges</td>
<td>12%</td>
</tr>
<tr>
<td>FH0. Customs valuations and reference pricing</td>
<td>13%</td>
</tr>
<tr>
<td>CA0. Pre-shipment inspection</td>
<td>9%</td>
</tr>
<tr>
<td>CZ0. Other pre-shipment inspection and other entry formalities</td>
<td>5%</td>
</tr>
<tr>
<td>CD0. Import monitoring and surveillance requirements and other</td>
<td>4%</td>
</tr>
<tr>
<td>automatic licensing measures</td>
<td></td>
</tr>
<tr>
<td>GZ0. Other finance measures</td>
<td>4%</td>
</tr>
<tr>
<td>HB0. Compulsory use of a national service (e.g. transport or</td>
<td>4%</td>
</tr>
<tr>
<td>insurance)</td>
<td></td>
</tr>
<tr>
<td>BA4. Inspection requirement</td>
<td>3%</td>
</tr>
<tr>
<td>Others</td>
<td>11%</td>
</tr>
</tbody>
</table>
Note:

• The survey is complete but the study is not.

• ITC will continue to engage with public institutions and business associations

• Request for cooperation

• Final report expected in September 2019
Round Table

- What are the Public Sector Perspective / Constraints

- The Way forward:
  - What are the concrete actions necessary to alleviate the hurdles to trade?
  - Enhancing capacity of the exporters?
  - Enhancing domestic procedures and infrastructure? Negotiations with partners?
  - What are the various initiative being taken or proposed?
  - What are the gaps that needs to be addressed?
Question / Comments?
All materials will be made available at:

www.ntmsurvey.org/pakistan
Thank you!

For further information:
www.ntmsurvey.org

ITC Programme on Non-Tariff Measures
Trade and Market Intelligence

International Trade Centre
Tel.: +41 (0)22 730 0184
Fax: +41 (0)22 730 0577

ntm@intracen.org

ITCmarketanalysistools

@ITC_MktAnalysis