

# **TIME RELEASE STUDY**

## **For Agricultural Commodities [2021/2022]**

**Chattogram Seaport**

**Dhaka Airport**

**Benapole Land Port**



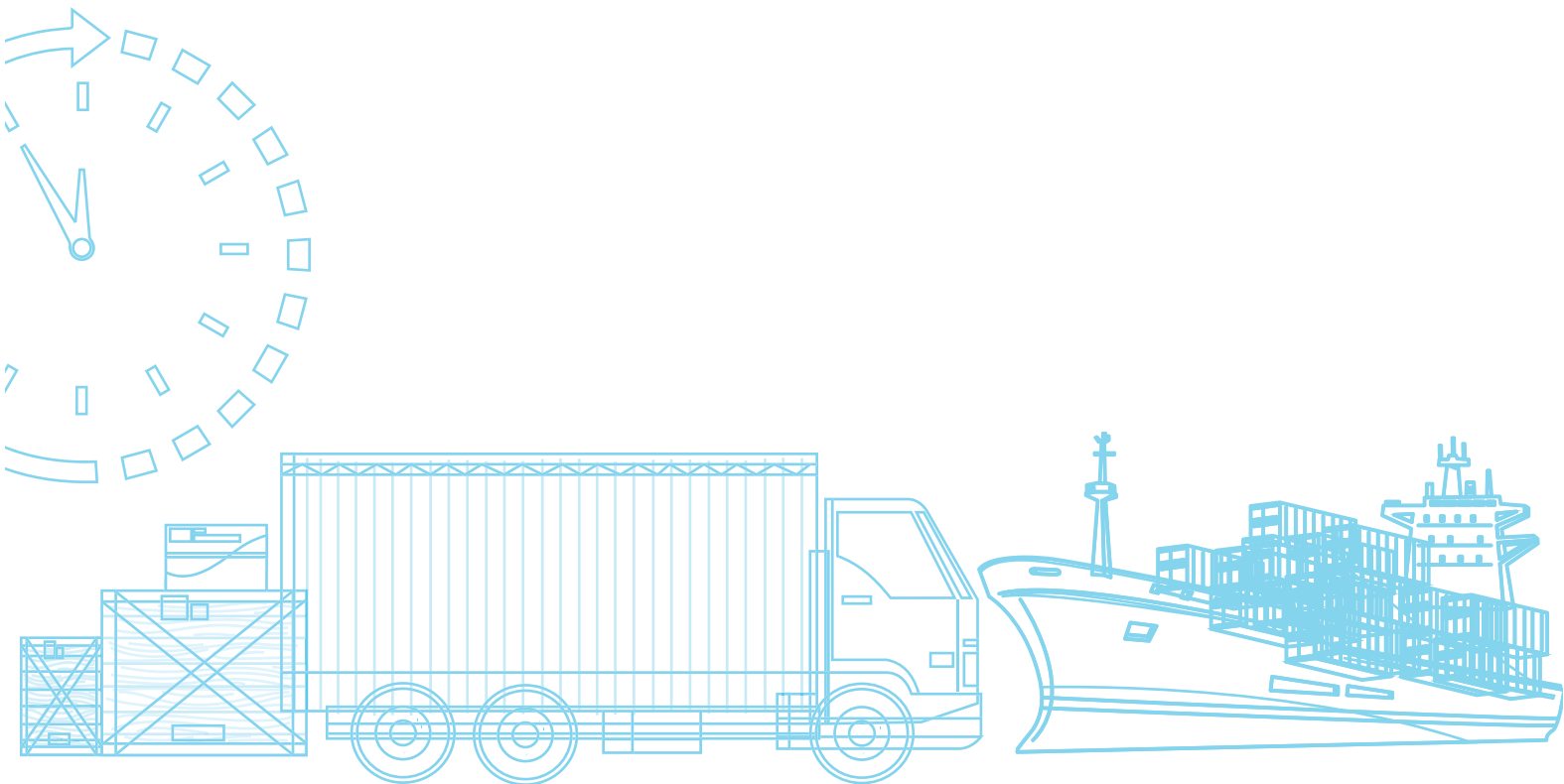
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**Dhaka Airport**

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# **TIME RELEASE STUDY** **For Agricultural Commodities [2021/2022]**

**Bangladesh Trade Facilitation Project**

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# ACKNOWLEDGEMENT

The U.S. Department of Agriculture funded Bangladesh Trade Facilitation Project promotes procedural changes and policy reform and provides technical, logistical, and technological assistance to Government of Bangladesh agencies and agro-food industry stakeholders. The goal is to make importing and exporting of agricultural products more efficient. Project activities are strengthening the capacity of the country to achieve WTO Trade Facilitation Agreement Category C measures covering Test Procedures, Risk Management, Perishables Goods, and Trade Formalities and Pre-clearance Processing.

We implemented the Time Release Study for Agricultural Commodities 2021/2022 following the World Customs Organization's methodology. The objective was to measure the clearance time and procedures for import and export of food and agricultural goods at Bangladesh's leading sea, land, and airports, which is the first of its kind initiative in Bangladesh. The study targeted agricultural commodities and food products traded under HS Chapter 1-24 and calculated the time that it takes by each agency involved to clear both export and import consignments.

Land O'Lakes Venture<sup>37</sup> implements the Bangladesh Trade Facilitation project and we recognize the funding received from the United States Department of Agriculture's Food for Progress Program to complete this nationally important study for Bangladesh.

We also commend the South Asian Network for Economic Modeling (SANEM) for their arduous efforts to design and implement the study, which was initiated in late 2021 after Covid restrictions were reduced, enabling access to ports. We also thank Nathan, Inc. a United States based economic advisory firm specializing in trade policy and WTO Trade Facilitation Agreement support, that coordinated the activities with SANEM.

We especially record our appreciation to officials from regulatory agencies that oversee trade of food and agricultural goods, which include the Department of Agricultural Extension, Department of Fisheries, Department of Livestock Services, Bangladesh Standards and Testing Institution, Bangladesh Atomic Energy Commission, Bangladesh Council for Scientific and Industrial Research. The gracious contributions—providing data, explaining processes, and sharing observations and experiences—received from officers at their headquarters as well as at different border points were essential for completion of the study.

A very special mention and commendation goes to the National Board of Revenue and Bangladesh Customs, including the Custom Houses and their officials at the three ports, for their continuous support, assistance, and guidance. Thanks are also due to the three Port Authorities for their contribution during the study and for authorizing the SANEM team to access to the port area.

We also acknowledge the active involvement and participation of various business stakeholders for their active participation at different stages of the study. Particularly, we thank import and export traders and the clearing and forwarding (C&F) agent companies and C&F employees for their tremendous support. Many of you responded to surveys and key informant interviews, participated in focus groups, and attended validation workshops in Chattogram, Dhaka, or Benapole.

Lastly, we give special recognition to A A M Amimul Ehsan Khan, Senior Technical Advisor – Risk Management; Nahrin Rahman Swarna, Technical Coordinator; and Recardo Saurav Antor Halder, Program Operations Coordinator; who formed the core implementation team for the Bangladesh Trade Facilitation Project, developing the strategy, communicating with partners, presenting the findings at workshops, and finalizing this written report.

Bangladesh Trade Facilitation project intends to implement one or more additional Time Release Study(ies) for Agricultural Commodities over the next three years and will seek close collaboration, coordination, and communication again with these partners and stakeholders. Thank you for your kind support.



## Message



I am delighted to know that the Bangladesh Trade Facilitation (BTF) Project, funded by the United States Department of Agriculture (USDA), has conducted the first-ever Agro-focused Time Release Study (TRS) in Bangladesh.

Agriculture sector is the lifeline of Bangladesh's economy that contributes 11.50 percent to GDP. The country has immense potential to capture the international market with its diversified agro-products.

The Honorable Prime Minister of the Government of the People's Republic of Bangladesh, Sheikh Hasina, MP, prioritizes the agriculture sector and achieving export diversification through enhanced export of value-added agro-products. With her visionary leadership and praiseworthy strategies to boost the agricultural sector, we are now not only self-reliant in the production of rice, vegetables, fish, and egg, but also are in a position to export these products to the world market. I believe the findings and recommendations of the TRS will help improve the competitiveness of Bangladeshi agro-products in the foreign market by reducing the time and cost to trade. Bangladesh is set to graduate as a developing country in 2026, and the increased agro-trade will pave the way to smooth and sustainable graduation through enhanced export.

I extend my sincere gratitude to the United States Department of Agriculture for realizing the importance of agro-trade in the country and coming forward to support the very timely TRS. The Ministry of Commerce will continue its efforts to improve the country's trade and business environment, partnering with the USDA to implement the TRS recommendations.

Joy Bangla, Joy Bangabandhu.

Tipu Munshi, MP  
Minister  
Ministry of Commerce  
Government of the People's Republic of Bangladesh



## Message



I am glad to know that the Bangladesh Trade Facilitation (BTF) Project funded by the United States Department of Agriculture (USDA) has conducted Agro-based Time Release Study (TRS) 2022, first of its kind in Bangladesh to measure the clearance time for both import and export of the agricultural and food products under the Harmonized System Code chapter from 1 to 24 following the World Customs Organization (WCO) TRS Guide. As the agricultural commodities i.e. plants and plant products, animal and animal products, fish and fish products and food items require special attention to release due to their perishable nature and some additional compliances need to be met from sanitary and phytosanitary (SPS) perspectives, this TRS will have huge impact on the release process of these goods to reduce the time taken.

I have learnt that the time taken by the Customs authority, Plant Quarantine Wing (PQW) of the Department of Agricultural Extension (DAE), Department of Livestock Services (DLS), Department of Fisheries (DoF), Bangladesh Standards and Testing Institution (BSTI), Bangladesh Atomic Energy Commission (BAEC) and Bangladesh Council of Scientific and Industrial Research (BCSIR) to issue permit, sanitary & phytosanitary certificate, release order, test certificate, etc. have been measured with the objective of reducing the total time to release the goods avoiding duplications (if any). The report has accommodated some findings and identified the bottlenecks for the delay with a set of time-bound recommendations to address the issue.

I would like to express my thanks to the USDA-funded BTF Project for conducting this TRS focusing on agro-trade. I believe, the Customs authorities will analyze the findings of the TRS and act on the recommendations following necessary review to facilitate the cross-border trade of agricultural commodities ensuring proper compliance.

Abu Hena Md. Rahmatul Muneem  
Senior Secretary  
Internal Resources Division  
&  
Chairman  
National Board of Revenue, Dhaka.



## Message



It is my pleasure to be informed that the USDA Bangladesh Trade Facilitation (BTF) Project has successfully completed the agro-based Time Release Study (TRS) at the three major ports of Bangladesh. This is a first of its kind in Bangladesh and captures all the dimensions of agro-product trade procedure. I thank the USDA BTF Project and the team who supported the study for the brilliant job.

Bangladesh, a member of the World Trade Organization (WTO), is committed to simplifying and harmonizing procedures for facilitating trade. Time Release Study is an internationally recognized tool to revisit and address the impediments to cross-border trade. Given the perishable nature and concerns over food safety, expedited release is even more significant for agro and food products. A Time Release Study exclusively targeting export and import of agricultural trade and identifying the agency-specific clearance time is, therefore, a timely initiative.

BTF's agro-focused Time Release Study has rightly pointed out the areas for improvement in the export-import clearance process for the agro-trade regulatory agencies. The recommendations made are also specific and action-oriented and will guide the future course of action for facilitating trade in this sector. The Ministry of Commerce is leading the National Trade Facilitation Committee (NTFC) that coordinates all trade facilitation-related activities, including convening the Agro-Trade Working Group formed under the NTFC, represented by all the agro-trade regulatory Ministries and agencies. The Ministry of Commerce will take necessary initiatives to place the recommendations in these policy-level platforms to expedite the implementation, engaging public and private sector stakeholders.

Tapan Kanti Ghosh  
Senior Secretary  
Ministry of Commerce  
Government of the People's Republic of Bangladesh



## Message



The United States Department of Agriculture-funded Bangladesh Trade Facilitation Project is proud to present the first ever agricultural trade focused Time Release Study conducted at Chattogram Seaport, Dhaka Airport, and Benapole Land Port. Analyzing the time it takes to handle and clear imports and exports of food products and agricultural commodities is part of the USDA Food for Progress program's objective to assist the Government of Bangladesh to simplify trade procedures and address systemic constraints. This agency-wise time calculation will be used as baseline data, giving scope and scale to measure the impact of process changes, the introduction of technology and automation, as well as other improvements in providing trade services by the Government agencies involved in regulating and promoting agricultural trade.

International trade in agriculture and food products is significant and is instrumental to growing Bangladesh's economy. We believe that the value and volume of agricultural exports can be significantly increased if we can "connect some of the dots" through policy and institutional reforms, coordination of resources amongst agencies, and through increased use of science and data analytics. The Time Release Study for Agricultural Commodities (2021/2022) highlights several areas that require special attention. The time-bound recommendations provide guidance to help Government agencies plan reform agendas in line with the country's international commitments toward trade facilitation and the vision for export diversification.

The Bangladesh Trade Facilitation project works directly with all the regulatory agencies in the country that are responsible for overseeing trade of agricultural and food products to strengthen their roles and capacities to facilitate cross-border trade. The interventions suggested in the report are relevant to most of these agencies and to the USDA project's objectives. Accordingly, we intend to work with the Government of Bangladesh to implement the recommendations in an effort to expedite the clearance process and reduce the time and cost to trade.

We request your support and collaboration to make impactful change to the agro-trade landscape of Bangladesh.

A handwritten signature in blue ink that reads "Michael J. Parr".

Michael J. Parr  
Project Director  
Bangladesh Trade Facilitation Project  
Land O'Lakes Venture37





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# LIST OF ACRONYMS

<b>AC</b>	Assistant Commissioner
<b>ARO</b>	Assistant Revenue Officer
<b>ASYCUDA</b>	Automated System for Customs Data
<b>AWB</b>	Air Waybill
<b>BAB</b>	Bangladesh Accreditation Board
<b>BAEC</b>	Bangladesh Atomic Energy Commission
<b>BBS</b>	Bangladesh Bureau of Statistics
<b>BCOM</b>	Bangladesh Customs Office Management
<b>BCSIR</b>	Bangladesh Council of Scientific and Industrial Research
<b>BDT</b>	Bangladeshi Taka
<b>BGB</b>	Border Guard Bangladesh
<b>BLPA</b>	Bangladesh Land Port Authority
<b>BSTI</b>	Bangladesh Standards and Testing Institution
<b>BTF</b>	Bangladesh Trade Facilitation Project
<b>BUET</b>	Bangladesh University of Engineering and Technology
<b>C&amp;F</b>	Clearing and Forwarding
<b>CA</b>	Counterpart Agencies
<b>CAAB</b>	Civil Aviation Authority of Bangladesh
<b>CCH</b>	Chattogram Custom House
<b>CPA</b>	Chattogram Port Authority
<b>DAE</b>	Department of Agricultural Extension
<b>DC</b>	Deputy Commissioner
<b>DCAA</b>	Dhaka Customs Agents Association
<b>DCH</b>	Dhaka Custom House
<b>DLS</b>	Department of Livestock Services
<b>DoF</b>	Department of Fisheries
<b>DTI</b>	Direct Traders Input
<b>DTM</b>	Deputy Traffic Manager
<b>EGM</b>	Export General Manifest
<b>EPB</b>	Export Promotion Bureau
<b>FCL</b>	Full Container Load
<b>FGD</b>	Focus Group Discussion
<b>GDP</b>	Gross Domestic Product
<b>GoB</b>	Government of Bangladesh
<b>GSP</b>	Generalized System of Preferences
<b>HS</b>	Harmonized System
<b>HSIA</b>	Hazrat Shahjalal International Airport
<b>ICT</b>	Information and Communications Technology
<b>IGM</b>	Import General Manifest



# LIST OF ACRONYMS

<b>ILO</b>	International Labor Organization
<b>IPO</b>	Import Policy Order
<b>IT</b>	Information Technology
<b>JC</b>	Joint Commissioner
<b>KII</b>	Key Informant Interview
<b>LCS</b>	Land Customs Station
<b>LCL</b>	Less than Container Load
<b>MoC</b>	Ministry of Commerce
<b>MoU</b>	Memorandum of Understanding

# KEY FINDINGS



Bangladesh Trade Facilitation Project, funded by the United States Department of Agriculture (USDA), has conducted the first-ever agro-focused Time Release Study (TRS) in Bangladesh focusing on import and export of agricultural goods and food items under HS Chapter 1-24. The TRS followed the methodology developed by the World Customs Organization's TRS Guide 2018 as international best practice, adapting where necessary, to cater for the idiosyncrasies related to agricultural goods. The report assessed the process and time taken by each agro-trade agency for exporting and importing agro products.

The section highlights the major findings of the Time Release Study (TRS) focused on cross-border trade in agricultural products. Observations of average clearance times for these products are presented for exports and imports of the Chattogram seaport, Dhaka airport and Benapole land port.

The Eighth Five-Year Plan of Government of Bangladesh (GoB) for economic development emphasizes an export-led growth strategy. This strategy entails facilitating exports and diversifying Bangladesh's export basket. Through this effort, the Government seeks to remove the existing anti-export bias, and has proposed incentives to stimulate exports, including direct cash incentives, tax holidays, duty drawbacks, and bonded warehouses. The TRS team's field visits and consultations with stakeholders provided evidence that the export process is far simpler than that for imports for all three ports. Export earnings are the primary source of foreign currency reserves for Bangladesh (totalling \$38.76 billion in FY 2021-22), which is an incentive for the government to focus on facilitation of exports.

## CHATTOGRAM SEAPORT

The survey for Chattogram seaport was conducted from January 1-31, 2022. All the calculations are based on the 24-hour format. Data was collected for both imports and exports during this period. The time calculations are inclusive of holidays/weekends and the end of business hours.

### IMPORTS

Average times are based on 185 samples (no. of certifications provided by the agencies for clearing products of the sampled 185 bills of entry were 305) of agricultural and food imports collected during this period.

The **average time required** to complete the overall import clearance procedure starting from the time the ship arrives to the release of the cargo/container is **7 days 7 hours and 58 minutes (minimum 1 day 1 hour 30 minutes, maximum 19 days 9 hours)**.

## CHATTOGRAM SEAPORT

The illustrative times required to receive clearance from the counterpart agencies are listed below:

### **Plant Quarantine Wing (PQW)**

9 hours 20 minutes on average

Based on 132 samples. Samples taken by PQW inspectors/officers in the morning (between 11 am-12 pm) receive their clearance reports by that afternoon (3-4 pm). For samples that are taken in the afternoon, clearance certificates are typically issued the following morning.

### **Department of Livestock Services (DLS)**

Maximum of 6 days, minimum 1 day

Based on five samples of animal feed. Additional information gathered from two KIIs and one FGD suggest that it takes between 1 to 4 working days to receive clearance from DLS.

### **Department of Fisheries (DoF)**

21 hours 36 minutes on average

44 samples requiring DoF certification were collected during the survey period.

### **Bangladesh Standards and Testing Institution (BSTI)**

Maximum 6 days, minimum 5 days

Only three samples were collected; therefore, this should not be interpreted as an average. Information from the three KIIs and one Focus Group Discussion (FGD) suggests that it is common for BSTI clearance to take approximately 7 days.

### **Bangladesh Atomic Energy Commission (BAEC)**

10 hours 9 minutes on average

121 samples requiring BAEC certification were collected. Fresh fruits, vegetables, and foodstuffs are tested to check radioactivity level.

### **Bangladesh Council of Scientific and Industrial Research (BCSIR)**

14 days to 1 month

No samples were identified requiring BCSIR certification. KIIs with Customs officials and C&F agents suggest that the time required to get clearance from BCSIR varies from 14 days to more than a month.

## CHATTOGRAM SEAPORT

### EXPORTS

Average times are based on 100 samples of agricultural and food exports collected between January 1-31, 2022.

The **average time** to complete the export clearance process starting from bill of export submission (online) to loading of the container into the vessel is **94 hours, 38 minutes**.

The average time once the container arrives at the port entry gate to the loading of the container in the vessel is 11 hours, 39 minutes.

### GENERAL OBSERVATIONS

The main hindrance in the clearance process in Chattogram is the disruption of the ASYCUDA World server. This information was prominent in the questionnaire data and was validated in KIIs with C&F agents and Customs officials. The reasons for disruptions include power cuts, overload of network systems, and weak internet connections. According to C&F agents and Customs sircars, server disruptions are frequent in Chattogram and occur almost every day for an average of one to two hours. However, the validation workshop revealed that the NBR is increasing the capacity of the ASYCUDA World server which had addressed the disruption issue.

Importers are often reluctant to release their consignments despite having finished the Customs and port clearance processes. In some cases, importers delay payment of duties due to price dynamics. If the price of the imported commodity is lower in the domestic market, the importer will be reluctant to clear such goods for sale until prices rise. Or, an importer could simply have his warehouse full, and storage space for the next shipments may not be available which leads him to keep the goods in the port. Such delays are not due to Customs or port procedures, but these delays still increase the average clearance time in Chattogram port.

Another significant reason for delays is that the importer takes additional time to provide original copies of some basic documents including the packing list, invoice, and bill of lading to the C&F agent.<sup>1</sup> This may be due to holidays, delays by banks or postal services, etc

Another factor that may slow clearance time is incomplete or vaguely-worded manifests provided by the shipping line, which often create confusion for Customs officers who may reject them, causing further delays.<sup>2</sup>

<sup>1</sup> Information from the Customs sircars.

<sup>2</sup> As reported by Customs officials during a KII.

## DHAKA AIRPORT

The survey timeline for Dhaka airport was from January 16-31, 2022. Data was collected for both imports and exports during this period. All calculations are in a 24-hour format. The time calculations are inclusive of holidays/weekends and the end of business hours.

### IMPORTS

Average times are based on 93 samples of agricultural and food imports collected during this period. Out of the 93 sampled bills of entry, 64 certifications by agencies were considered for calculation along with 13 that were taken from outside of the survey period. The rest bills of entry (29 samples) did not undergo any testing as those were imported, as very small scale samples, by express courier.

The **average time** required to complete the overall import clearance procedure starting from the submission of the bill of entry (online) to the final release of the goods is **23 hours 24 minutes (minimum 2 hours 30 minutes, maximum 120 hours 25 minutes)**.

The illustrated times required to receive clearance from the counterpart agencies are as follows: .

#### Plant Quarantine Wing (PQW)

52 minutes on average

Based on 55 samples. Maximum 1 hour 40 minutes, minimum 25 minutes.

#### Department of Livestock Services (DLS)

1-2 hours

No sample bills of entry that required clearance from the DLS were collected during the survey period. KIIs with the livestock quarantine officer at Hazrat Shahjalal International Airport (HSIA) and FGDs with C&F agents suggest that DLS clearance takes between 1 and 2 hours.

#### Department of Fisheries (DoF)

Maximum 55 minutes, minimum 25 minutes

The average timing could not be calculated as only nine samples were collected requiring DoF clearance.

#### Bangladesh Standards and Testing Institution (BSTI)

35 days

Only one bill of entry requiring BSTI certification was collected which reflects a time of 35 days to receive BSTI clearance. This should not be considered as an average. This sample was not collected from the survey period (January 16-31, 2022).<sup>3</sup>

#### Bangladesh Atomic Energy Commission (BAEC)

Maximum 10 days, minimum 2 days

The average timing could not be calculated as five samples were used for the calculation and these bills of entry were collected from outside the survey period

#### Bangladesh Council for Scientific and Industrial Research (BCSIR)

Maximum 30 days, minimum 5 days

The average timing could not be calculated as seven samples were used for the calculation and these bills of entry were collected from outside the survey period.

<sup>3</sup> Sample sent to BSTI on November 24, 2021; clearance report issued by BSTI on December 28, 2021, and clearance report received by the Dhaka Custom House on December 30, 2021.

## DHAKA AIRPORT

### EXPORTS

Average times are based on 100 samples of agricultural and food exports collected between January 16-31, 2022.

The average time to complete the export clearance process starting from submission of the bill of export (online) to the flight leaving with consignments is 47 hours 37 minutes (minimum 6 hours 15 minutes, maximum 318 hours 50 minutes). The deviation is wide since bills of export are usually submitted and assessed 1-2 days ahead of the truck's arrival at the export cargo village. In some cases, the C&F agent submits the bill of export before the exporter has begun packing the product for shipment. Other factors that explain some of the variation in average export times include supply shortages, exporter mismanagement (failure to prepare the necessary documentation), heavy traffic getting to the airport, and freight and other transport costs. As the freight costs of airlines fluctuate based on timing and demand for spaces in the aircraft, the exporters may delay shipment to secure cheaper rates for air freight.

The average time to complete the export clearance process starting from the truck entry to the export cargo village to the flight leaving with consignments is 6 hours 39 minutes (minimum 4 hours, maximum 8 hours, 30 minutes).

### GENERAL OBSERVATIONS

As was the case in Chattogram, the most common hindrance in the clearance process is the disruption of the ASYCUDA World server, as noted by the Customs Sircars and Customs officials in the questionnaires, and also by the FGDs conducted with the C&F leaders, which is now being addressed by the NBR through expanding the capacity of the ASYCUDA server.

The export processing is generally simpler than import processing at the Dhaka airport. This is common for almost all ports of Bangladesh, mainly due to the Bangladesh government's mandate to facilitate exports. However, while the process itself is simpler, traders seem to lack capacity, and transportation/logistics issues are adding to the export times outside of Customs and OGA operations.

Importers are often reluctant to release their consignments despite having finished the Customs and port clearance.<sup>4</sup> The C&F agents reported that importers may take 2-3 days after assessment and examination are completed to pay applicable duties and fees. While such delays are not due to Customs or port procedures, they nevertheless increased the average clearance time.

<sup>4</sup> This happens when the price of the imported agricultural product is lower in the market than the average import price

## DHAKA AIRPORT

The assessment and examination officers at Dhaka Custom House are overwhelmed with the workload which contributes to the delay in the clearance process.

Another significant reason for the delayed release of consignments is that the original copies of some basic documents including the packing list, invoice, and air waybill often take significant time to be received by the C&F agent from the importer.<sup>5</sup> Delays in providing these documents may be due to holidays, delays by banks or postal services, etc.

For the export clearance process, bills of export are generally submitted and assessed 1-2 days earlier than the date of arrival of the truck to the export cargo village. The truck's delay in arrival at the export cargo village can be attributed to various reasons such as a delay in the packaging of products by the importer, traffic congestion, unavailability of freight spaces in aircraft, and price competition among the airlines for air freight spaces, etc.<sup>6</sup>

Other Government Agencies (OGAs) functions from 9.00 am to 5.00 pm. The office hours are similar for all the counterpart agencies' offices in all three ports. This means sample testing and certification cannot be carried out after working hours, which impedes the import clearance process. Extending these hours or opening for a few hours on weekends would increase responsiveness of OGAs.

The amount of storage space and the cold storage facilities in the import village are inadequate. Perishable commodities are often left on the runway due to inadequate space at the import cargo village and very minimal cold storage facilities.<sup>7</sup>

There is not sufficient storage space in the export cargo village. Goods often occupy the export cargo village shed area, delaying the entry of trucks to the export village which delays the unloading of goods from the trucks.

Some scanners in the export cargo villages are not continuously operational. Technicians for these scanners are called from abroad to fix those which often takes months. This is a significant cause of delay in the export process.<sup>8</sup>

The process of allocating a separate space for agricultural and perishable commodities at the export cargo village is still being developed. The lack of a separate space for perishable commodities often impedes the export clearance process as most spaces at the export cargo village are generally occupied by consignments of ready-made garments.

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<sup>5</sup> Information from the Customs sircars.

<sup>6</sup> KII with C&F agent (export).

<sup>7</sup> KII with C&F agent.

<sup>8</sup> KII with C&F agent dedicatedly handling export of perishable items.



## BENAPOLE LAND PORT

The survey timeline for Benapole land port took place from December 28, 2021, to January 9, 2022. Data was collected for both imports and exports during this period. All calculations are in a 24-hour format. The time calculations are inclusive of holidays/weekends and the end of business hours.

### IMPORTS

Average times are based on 59 samples of agricultural and food imports collected during this period of which four certifications reviewed were out of the survey period. Fifty-two samples were subject to simplified procedures and the remaining three samples were entered under normal procedures.

The average time to complete the import clearance process for bills of entry subject to the simplified procedure, starting from when the border person presents the documents at the border to the final release of the goods, is **8 hours and 12 minutes. days 9 hours).**

For bills of entry that were not eligible for the simplified procedure, e. g. shipments of animal feed, it was not possible to calculate an average clearance time due to the small sample size (only three). For these products, the time required to complete the import clearance procedure starting from the time when the border person presents the documents at the border to the final release of the goods, is **maximum 178 hours 10 minutes (7 days), minimum 172 hours 48 minutes (7 days).**

The import clearance processes for the simplified and non-simplified procedures differ. The goods subject to the simplified procedure are mostly perishable commodities, oxygen supplies, and some pharmaceutical products. The goods subject to simplified procedures get posted directly to a shed after the truck has crossed the India-Bangladesh border. On the other hand, the goods that are not subject to the simplified procedure first move to the Truck Terminal of India (TTI) of the Benapole port after entering the Bangladesh border, and then TTI provides the shed posting. The goods subject to the simplified procedure are not required to complete the formalities at the TTI.

## BENAPOLE LAND PORT

The illustrative times required to receive clearance from the counterpart agencies are as follows:

### Plant Quarantine Wing (PQW)

1 hour

Clearances time calculated based on 31 samples.

### Department of Livestock Service (DLS)

Minimum 2 days, maximum 5 days

Three samples were collected that required certification from the DLS, which is insufficient to calculate a statistical average. For these samples, the minimum time required to get DLS certification was 2 days, and the maximum time required was 5 days.

### Department of Fisheries (DoF)

35 minutes

Clearances time was calculated based 21 samples.

### Bangladesh Standards and Testing Institution (BSTI)

14 days

Only one clearance certificate was reviewed, although from outside the survey period.

### Bangladesh Council for Scientific and Industrial Research (BCSIR)

Minimum 15 days, maximum 83 days

Three clearance certificates were reviewed, although from outside the survey period. The minimum time required to receive clearance from BCSIR was 15 days, maximum of 83 days.

## EXPORTS

Average times are based on 15 samples of agricultural and food exports collected between December 28, 2021, and January 9, 2022.

The **average time** to complete the export clearing process for the agricultural commodities, starting from bills of export submission to exit of the truck from the Bangladesh border is **5 days (maximum 13 days, minimum 1 day)**. Although this might seem relatively high, this average is likely due to the bills of export being submitted online days before the arrival of the truck at the export yard. This leads to an increase in total time to export when calculated from the time of submission of the bill of export. However, once the truck enters the export yard the average release time sharply decreases to 50 minutes.

## BENAPOLE LAND PORT

Gaps exist between steps in the export process, which lengthens the total clearance time. These delays are not all due to the inefficiency of the Customs or the port authority, they are instead attributable to other factors, including traffic congestion while traveling to Benapole, failure to pack and or manage items appropriately, lack of available trucks, strikes, etc.

### GENERAL OBSERVATIONS

As was the case in Chattogram and Dhaka, the most common hindrance in the clearance process is the disruption of the ASYCUDA World server, as noted by Customs sircars in the questionnaires, and the Key Informant Interviews (KIIs) conducted with the clearing and forwarding (C&F) agents and Customs officials. Reasons for the server disruptions include power cuts, overload of network systems, and weak internet connections. From the qualitative responses of the C&F agents and Customs Sircars, server disruptions are frequent in Benapole and occur almost every day for an average of one to two hours. However, the validation workshop revealed that the NBR is increasing the capacity of the ASYCUDA World server which had addressed the disruption issue.

In general, the export clearance process at the Benapole Custom House is simpler than the import clearance process. The import business process consists of 25 steps while the export business process consists of 16 steps. This may reflect a lack of capacity on the part of the exporter and the importance of transportation/logistics issues in inflating export times.

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The time required for the certification of the testing agencies is directly proportional to the distance of their offices from the port. The absence of BSTI, BCSIR, and DLS testing labs and offices impedes the import clearance procedure for agricultural products

Shed space is limited, and truck movements are often hampered due to traffic congestion on the roads near the shed areas and the Truck Terminal of India (TTI)<sup>9</sup>

To control the illegal smuggling of fuel from Bangladesh to India, the Border Guard Bangladesh (BGB) measures the amount of fuel the Indian truck is carrying and then checks the amount of fuel when leaving the border. These randomized fuel measurements can lead to delays for Indian trucks entering Bangladeshi territory.

<sup>9</sup> General comment received from the KIIs.

# Major Recommendations

This section presents the principal recommendations for decreasing processing times of agricultural and food products at Benapole land port, Chattogram seaport, Dhaka airport, and across all the three locations. A more detailed set of short-term, medium-term, and long term recommendations are provided in Chapter 8 - Recommendations.

## CHATTOGRAM SEAPORT

Recommendations for Chattogram seaport are geared towards reducing redundant steps and increasing the efficiency of port procedures.

The functionality of the “Outpass” section should be reconsidered. Eliminating this unnecessary process, once the assessment notice is printed, would reduce clearance time. This should be a short-term target for Chattogram Custom House.

Containers are sometimes scanned even after they have undergone physical inspections. This is a redundant step and impedes the overall clearance process, increasing the average clearance time. Chattogram Custom House and the Chattogram Port Authority (CPA) can coordinate to eliminate this practice as a short-term target.

Increasing the number of functionalities of off-dock premises can reduce traffic created by consignments leaving at the port. During the survey period, 17 of 19 off-dock facilities at the Chattogram Port are functional. More off-dock and depot facilities will reduce pressure and strengthen trade facilitation at Chattogram port. Dedicated off docks for agro-product can be thought of so manpower can be allocated accordingly. This should be a medium-term to long-term target of the NBR.

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The integration of ASYCUDA World with the central server of CPA can eliminate the need for C&F agents to contact the port authority to identify the container location. This should be a medium-term goal of the CPA, Chattogram Custom House, Ministry of Shipping, and the NBR.

## CHATTOGRAM SEAPORT

During the physical examination phase, the corresponding examination officer is assigned by the Assistant Commissioner (AC) at the jetty. This process can be automated to save time. The automated system should integrate the tasks of the Chattogram Custom House and Chattogram Port Authority, which will also automatically communicate examination times to the CPA, facilitating increased efficiency in overall container management. Implementation of an automated system should be a medium-term goal of the CPA, Chattogram Custom House, Ministry of Shipping, and the NBR.

## DHAKA AIRPORT

Recommendations for Dhaka airport are targeted towards reducing redundant steps and enhancing the import and export cargo village facilities.

The export processing referral mechanism utilized by the Revenue Officer (RO) and the Assistant Revenue Officer (ARO) for the examination process at the export cargo village should be automated to save time. This would allow the C&F agent to submit files directly to the designated ARO, removing an unnecessary step. The Dhaka Custom House needs to implement an automated referral mechanism as a short-term target.

The need to submit bank receipts to the ARO can be eliminated, as Biman Bangladesh Airlines can verify payment information online. This should be a short-term goal for the Dhaka Custom House.

NBR, Dhaka Custom House, Civil Aviation Authority of Bangladesh (CAAB), Biman Bangladesh Airlines, and private sector actors should collaborate to establish adequate space in the import village and ensure a better cold storage infrastructure for perishable and agricultural commodities through Memorandums of Understanding (MoUs) or other modes of collaboration. For example, the CAAB can provide space, Biman Bangladesh Airlines can handle logistics, and the private sector can provide funding and management for the cold storage facility. This should be a medium-term priority.

The allocation and creation of a separate space for agricultural and perishable commodities at the export cargo village should be expedited to reduce the delays in the clearance process. CAAB has already taken the initiative to start development of a separate space for agriculture and perishable items at the export cargo village. Completing this facility should be a short-term priority.

## DHAKA AIRPORT

Local technicians and private investors should be engaged to solve interruptions and technical failures of the scanners at the export village. These issues can take months to address as foreign technicians are required to travel to Bangladesh to solve such issues. A shortlist of local technicians (from local IT firms) should be developed for much more rapid service. Private investors can buy and maintain high-quality scanners to serve the needs of the export village. This needs to be a medium-term priority for the CAAB.

## BENAPOLE LAND PORT

Recommendations for Dhaka airport are targeted towards reducing redundant steps and enhancing the import and export cargo village facilities.

The port infrastructure requires additional and better maintained shed areas. Trucks are often unable to travel to the designated shed due to traffic congestion, which is a significant cause of delay in the release of agricultural products. This should be a medium-term goal for Bangladesh Land Port Authority (BLPA) and the Ministry of Shipping.

The introduction of a computer-based joint (India-Bangladesh) truck entry system would streamline the process and reduce truck entry time. This should be a medium-term goal of the Ministry of Commerce (MoC), Ministry of Foreign Affairs (MoFA), Ministry of Shipping, National Board of Revenue (NBR), Benapole Custom House, and Bangladesh Land Port Authority (BLPA).

# Overarching Recommendations

100% examination impedes the overall import clearance process. This needs to be replaced by system-generated random risk management provisions against the import declarations, based on WCO best practices. This should be a medium-term target for the concerned regulatory agencies (PQW, DLS, DoF, BSTI, BAEC).

Green, yellow, red, and blue line-based assessment systems of ASYCUDA World need to be fully implemented to reduce the time required for clearance. Introduction of trusted trader and Authorized Economic Operator (AEO) programs can help implement the green and yellow channel-based clearance process, and thus reduce clearance times drastically. Bangladesh's AEO program has only three entities now. Increasing this number and strengthening AEO initiatives targeted at agricultural commodities will ensure faster clearance times.

Recommendations for all three ports involve the improvement of IT infrastructure and the implementation a paperless clearance system, the automation and integration of OGA processes with Customs, the improvement of risk management practices, and the improvement of services provided by Customs and OGAs.

The manual submission and processing of Customs-related documents should be replaced with electronic system to reduce delays in the clearance process. NBR and the three Custom Houses should accelerate the phasing out of paper declarations and adoption of a fully automated declaration and clearance system. This should be a medium-term target.

The clearance processes of OGAs and Customs should be automated and integrated with the ASYCUDA World to be fully coordinated with Customs. This could be done in phases and should be considered a medium-term to long-term priority of the NBR.

Assessment group officers at the examination sections of the Custom Houses are overwhelmed. Additional officers at the three Custom Houses should be staffed to reduce pressure on current staff and accelerate the clearance process. As a medium-term priority, the NBR needs to consider employing additional human resources or adjusting the existing resources distribution among the Custom Houses.

All offices and agencies involved in certification, Customs, and port operations should consider increasing their service hours, either by extending the work day from 8 hours to 12 hours or 16 hours, or by implementing a 6-day work week. While ports are operational around-the-clock, the Custom Houses, OGAs, and banks are not. KIIs with stakeholders in Chattogram indicated that Custom Houses are operational on Saturdays with one to two officers conducting assessments, however, this does not fulfill the terms of the NBR circular which mandates that the three Custom Houses should operate around-the-clock. This could be implemented in phases and should be considered as a medium-term to long-term target for all the concerned agencies.

The establishment of fixed lunch hours at staggered times for Customs officials, port authorities, and OGAs can avoid delays in the clearance process. Officers are frequently called for in-house meetings, delaying the clearance process. The Custom Houses, ports and OGAs should set an official weekly meeting time, which will not disrupt or delay the clearance process. This should be a short-term target for each Custom House, Port authorities, NBR, Ministry of Shipping and OGAs.

Banking hours at the port areas overall should be aligned with other agencies as delay in payments due to different operational hours, early closure and weekly holidays of banks at the port areas causes delay in payment making the clearance process time consuming. As Customs and port authorities and in cases regulatory agencies provide services beyond office hours, banks should also have such mechanism. In addition, RTGS processing should continue at least till 6pm, which, at present is 4pm or even 3:30pm, especially the banks other than Sonali Bank.

The establishment of testing facilities in closer proximity to the port premises will reduce certification time significantly. NBR, port authorities, and the three Custom Houses should coordinate to allocate space for joint testing by different authorities under the same roof or at least in the port vicinity. This should be considered a medium-term target.

The IPO 2021-24 has enabled scopes for including Government approved laboratories other than BSTI and BCSIR to be included in the process of testing of imported food products. However, the provision is not being implemented as there are not set guideline or list of such laboratories. The Ministry of Commerce need to issue the list of laboratories outlining the capacity requirements so the Customs can send samples to those laboratories which would contribute to reduction in clearance time.

BCSIR is expected to test whether the samples are suitable for human consumption, which could apply to over 200 chemical elements. If requests were developed for specific elements (i.e., chromium, lead, potassium, sulfur, etc.), the testing process would be expedited. MoC should formulate a set of parameters that they will test to declare any item suitable for human consumption, in consultation with NBR, the Custom Houses and concerned OGAs. This should be a short-term goal for MoC and NBR.

Full automation of the payment procedure for both the export and import processes is necessary to reduce the timing associated with payment of trade-related duties and fees. Customs is accepting e-payment for payment of duties and taxes in 95% of the cases but not being able to implement it fully due to challenges at the Banks' end. At present, some banks authorized for receiving treasury challan and e-payment are accepting e-payment till 4pm, which should be addressed and made at least be enhanced till 6pm to get the full benefit out of the e-payment system initiated by Customs. This will significantly impact the timing in TRS.

Online submission of RTGS also requires physical submission of application form which retains the hassle of manual payment. This needs to be addressed to make the full system automated.



Required formalin and radiation tests increase the clearance time for perishable commodities. High levels of formalin and radiation are seldom found in consignments containing perishable commodities.<sup>12</sup> A random, risk-based assessment regarding such testing would reduce the average clearance time. This needs to be a medium-term to long-term priority for the MoC and the NBR.

Mutual Recognition Agreements (MRAs) between the testing agencies of Bangladesh and other countries are a 'best practice approach' to reduce the clearance time of agricultural products for both imports and exports. These MRAs will allow the Customs authority of the importing country to clear the goods faster without needing to send the samples to the local testing labs. This is a long-term target. The process can start with SAFTA or BIMSTEC member countries and progress gradually.



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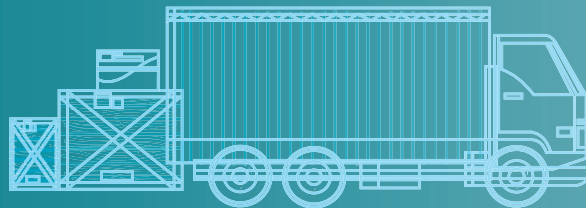
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# 1

# INTRODUCTION



# 1.1 Background

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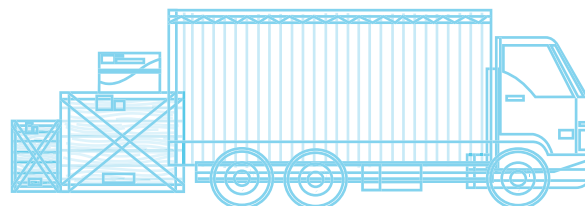
International trade is an important component of generating wealth and an important source of economic development (Johnson, 1958; Barker, 1977; Afonso, 2001; Singh, 2010; Van den Berg & Lewer, 2015). The combination of a significant rise in trade volumes, lower tariff rates, and modernization of technology has led to improved efficiency in cross-border trade and the ability to meet the timely production delivery requirements of global value chains (Wilson, Mann, & Otsuki, 2003; 2005). Customs administrations play a key role in collecting revenue, facilitating trade, ensuring compliance with laws and regulations, safeguarding the supply chain and ultimately reducing poverty (De Wulf & Sokol 2005; Widdowson, 2007).

In an increasingly globalized world, cross-border trade has increased significantly, demanding the optimization of trade-related procedures and regulatory processes. For a country's government and the private sector, it is important to have proper insight into end-to-end supply chain management and the effectiveness of the Customs administration while processing the shipments for release. To meet the demands of increasing trade flows, streamlining and simplifying procedures carried out by the Customs administration benefits all parties involved in trading – importers, exporters, and the overall economy (Zake, 2011; Montagnat-Rentier & Parent, 2012).

Promising export performance is a major component driving the economic growth of Bangladesh (Begum & Shamsuddin, 1998; Hossain & Dias Karunaratne; 2004; Al Mamun & Nath, 2005; Sultan, 2008; Kibria & Hossain, 2020; Islam, 2021). The combination of steady economic growth and structural transformation has contributed to Bangladesh's economic development (Ahluwalia & Mahmud, 2004; Raihan & Khan, 2020). However, a major hurdle for the country to reach its full trade-related potential is inefficiencies in the cross-border clearance process, which raises costs and delays shipments unnecessarily, inflating release time. For perishable agricultural goods, long release time can adversely impact goods and degrade their quality.

The Time Release Study (TRS) is a strategic tool developed by the World Customs Organization (WCO) with the objective of measuring the efficiency of cross-border trade. In general, TRS exercises are conducted to assess the efficiency of clearance processes, identify bottlenecks, generate baseline data, and assess the impact of trade facilitation initiatives. The focus of the TRS can be adjusted depending on the context. A TRS can be tailored to specific modes of transport (air, land, sea); business processes (export or import); particular aspects of the clearance process (assessment, examination, border performance); or analysis of a particular product type (perishable items, manufactured goods), etc. (WCO TRS Guide, 2018) .

The Customs Modernization Strategic Action Plan 2019–22 designated the TRS as a medium-term priority for the Benapole Custom House, to be completed within two years. To fulfill this mandate, NBR made it compulsory for every Custom House and Land



Customs Stations (LCSs) to carry out a TRS using data from ASYCUDA World, the automated Customs system. However, to date, NBR has no plans to conduct a sector-specific TRS.

At present, almost all agricultural and food-related commodities imported into or exported from Bangladesh undergo various tests and inspections by multiple regulatory and certifying authorities. To gather more detailed information on the times required for processing and Customs clearance of these products, the United States Department of Agriculture (USDA) funded Bangladesh Trade Facilitation (BTF) Project initiated a TRS specific to agricultural commodities at the Chattogram Seaport, Dhaka Airport and Benapole Land Port. The South Asian Network on Economic Modeling (SANEM), a prominent Bangladesh think-tank, carried out the TRS.

## 1.2 Objective and Scope of the Study

The overall objective of this TRS is to document the time required for agricultural commodities i.e. plant and plant products, fish and fish products, animal and animal products and food products<sup>14</sup> to complete all phases of the import and export clearance process. This analysis will primarily focus on the role of BTF's five 'plus one' counterpart agencies (Plant Quarantine Wing (PQW), Department of Livestock Services (DLS), Department of Fisheries (DoF), Bangladesh Standards and Testing Institution (BSTI), Bangladesh Atomic Energy Commission (BAEC), and Bangladesh Council for Scientific and Industrial Research (BCSIR))<sup>15</sup> and other relevant actors in the Customs clearance process for trade in agricultural commodities at the three selected ports. The findings are intended to serve as baseline data for BTF and National Board of Revenue (NBR) for future interventions related to Customs modernization and will assist Bangladesh in the implementation of the World Trade Organization (WTO) Trade Facilitation Agreement (TFA) related to process simplification and standardization, test procedures, automation, risk management, and special treatment of perishable goods, etc.

<sup>14</sup> Harmonized System (HS) chapters 1-24 are considered as agricultural commodities for the purposes of this TRS.

<sup>15</sup> PQW, DLS, DoF, BSTI, and BAEC are the five primary counterpart certification agencies for agricultural products and foodstuffs in Bangladesh. BCSIR, or the 'plus one', represents an additional certification agency considered in the TRS because of its relevance to food products.



## **THE SPECIFIC OBJECTIVES OF THIS REPORT ARE TO:**

**1. Analyze existing clearance procedures carried out by Customs and border authorities at the Chattogram Seaport, Dhaka Airport and Benapole Land Port;**

**2. Identify significant causes of delays at each step and possible duplicative processes (if any);**

**3. Analyze the role of BTF's five plus one counterpart agencies in the goods clearance process;**

**4. Identify the total time required to receive a clearance certificate from the counterpart agencies;**

**5. Provide a series of targeted recommendations to reduce the time and cost for import and export clearance of agricultural and food products;**

## 1.3 Organization of the Report

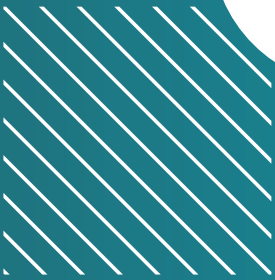
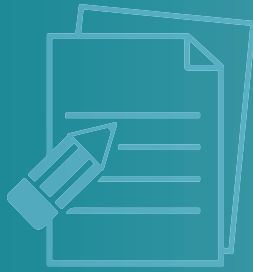
Chapter one introduces the TRS; chapter two incorporates a brief literature review of both international and Bangladesh-specific sources; chapter three provides a detailed explanation of the methodology used to gather and analyze data in the three selected ports; chapter four provides an overview of the agriculture sector in Bangladesh; chapters five, six and seven provide a brief overview of the steps involved in the import and export clearance process, along with the timing required to complete each step at Chattogram Seaport, Dhaka Airport and Benapole Land Port respectively; chapter eight provides detailed recommendations and interventions to reduce the clearance time of goods (for both imports and exports) at the selected ports; chapter nine discusses the limitations of this study, and chapter ten provides a conclusion.





# 2

# LITERATURE REVIEW





# Literature Review



The World Customs Organization (WCO) has long sought a balance between trade facilitation and compliance with statutory requirements (Weerth, 2009). The WCO focuses on smoothing and standardizing Customs practices in all member countries (Widdowson, 2007). In this context, trade facilitation refers to the avoidance of unnecessary trade restrictions that hinder trade flows. This can be achieved through innovative tools and modern technologies while simultaneously improving quality control in line with best global practices. The WCO's objective is to increase Customs administrations' efficiency and effectiveness by simplifying burdensome Customs procedures. To provide guidance, the WCO has developed several instruments and tools to be utilized by Customs administrations, one such tool being the 'Guide to Measure the Time Required for the Release of Goods (2018)'<sup>16</sup>.

The TRS is a globally recognized tool to measure the time required for the release and/or clearance of import and export products (Zhang, 2009; Matsuda, 2012; Desiderio, 2019). It measures the duration from the time of arrival at a port or border crossing through the release of the cargo. The TRS also seeks to identify bottlenecks in the trade flow process. The process seeks empirical evidence for re-structuring existing procedures to mitigate inefficiencies, improve border management, and establish a baseline for border performance measurements (WCO, 2018). The rationale behind conducting the TRS is that the process is a cycle of continual improvement. It is therefore important to repeat the TRS periodically.

All three ports selected for the TRS study are vital to the country's economy. As the

largest seaport in Bangladesh, the Chattogram Port Authority handles 41 million tons of cargo annually.<sup>17</sup> About 5.75 million metric tons of cargo passed through Benapole in fiscal year 2021<sup>18</sup>, and Hazrat Shahjalal International Airport (HSIA) reportedly handled 361,171 tons of air cargo in FY 2018-19.<sup>19</sup>

A TRS was conducted in 2017 for the Benapole port which examined all products entering and leaving the port. The study identified significant issues, including repetitive submission of documents, a manual as opposed to automated clearance system, a lack of robust risk management, and a lack of formal post-clearance audit. Since then, Benapole Custom House and Benapole Land Port Authority have significantly reduced the average clearance time of agricultural and perishable items.

A TRS was conducted at Chittagong Custom House and Chittagong Port in 2014 in four phases. Phase three of the TRS included pilot testing to confirm whether data collection could be carried out. The study suggested that the pilot results were unsatisfactory because the questionnaires distributed were not properly answered and were not returned to the authorities conducting the TRS. Another limitation of the study arose when most of the data on release dates and times provided in the completed questionnaires were not verifiable against data in ASYCUDA. Those results were eliminated and the analysis was restricted to the verifiable questionnaire responses that aligned with ASYCUDA. The average cargo clearance time for imports was 11 days, 9 hours, and 45 minutes and the average cargo clearance time for exports was 4 days, 22

<sup>16</sup> [http://www.wcoomd.org/-/media/wco/public/global/pdf/topics/facilitation/instruments-and-tools/tools/time-release-study/trs-guide\\_en.pdf?db=web](http://www.wcoomd.org/-/media/wco/public/global/pdf/topics/facilitation/instruments-and-tools/tools/time-release-study/trs-guide_en.pdf?db=web)

<sup>17</sup> Rattri, F. (2018). Impact of Chittagong port development on the economy of Bangladesh. Bangladesh Marine Academy.

<sup>18</sup> <http://www.bsbk.gov.bd/site/page/17e64e7c-f40c-4186-95c1-a9b0e715309f/>

<sup>19</sup> Export Thru Shahjalal Airport: Too costly for businesses | The Daily Star



hours, and 38 minutes<sup>20</sup>. These relatively long clearance times highlight the need to reduce clearance times to facilitate trade in addition to meeting the objectives detailed in the NBR's Customs Strategic Action Plan.

There have not been any TRS activities conducted for the Hazrat Shahjalal International Airport or Dhaka Custom House. In this case, India's experience can serve as a comparator for air cargo clearance times. India conducted a TRS in 2020 at the Mumbai International Airport, which found an average import clearance time of 64 hours and an average export clearance time of 24 hours (Government of India, 2020)<sup>21</sup>. This process was repeated in 2021 at six additional airports. The India National Trade Facilitation Action Plan (NTFAP) seeks to reduce the release clearance times of air cargo imports to 48 hours and 24 hours for exports (Government of India, 2021)<sup>22</sup>.



<sup>20</sup> <https://nbr.gov.bd/uploads/publications/Time%20Release%20Study%20Report%20-Chittagong.pdf>

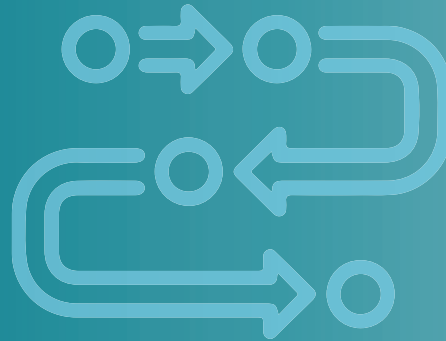
<sup>21</sup> Government of India. (2020). TIME RELEASE STUDY 2020. Central Board of Indirect Taxes and Customs. Ministry of Finance. <http://accmumbai.gov.in/aircargo/pdf/ACCTRS2020.pdf>

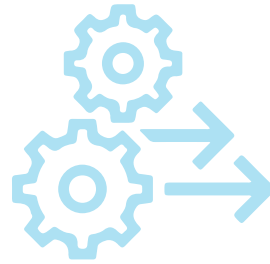
<sup>22</sup> Government of India. (2021). National Time Release Study 2021. Central Board of Indirect Taxes and Customs. Ministry of Finance. <https://www.cbic.gov.in/resources/htdocs-cbec/implmntn-in-trade-facilitation/National%20Time%20Release%20Study%202021.pdf>



# 3

## METHODOLOGY





The team utilized a mixed methods approach, drawing on a combination of qualitative and quantitative tools to carry out the TRS. A detailed description of each of the methodology follows.

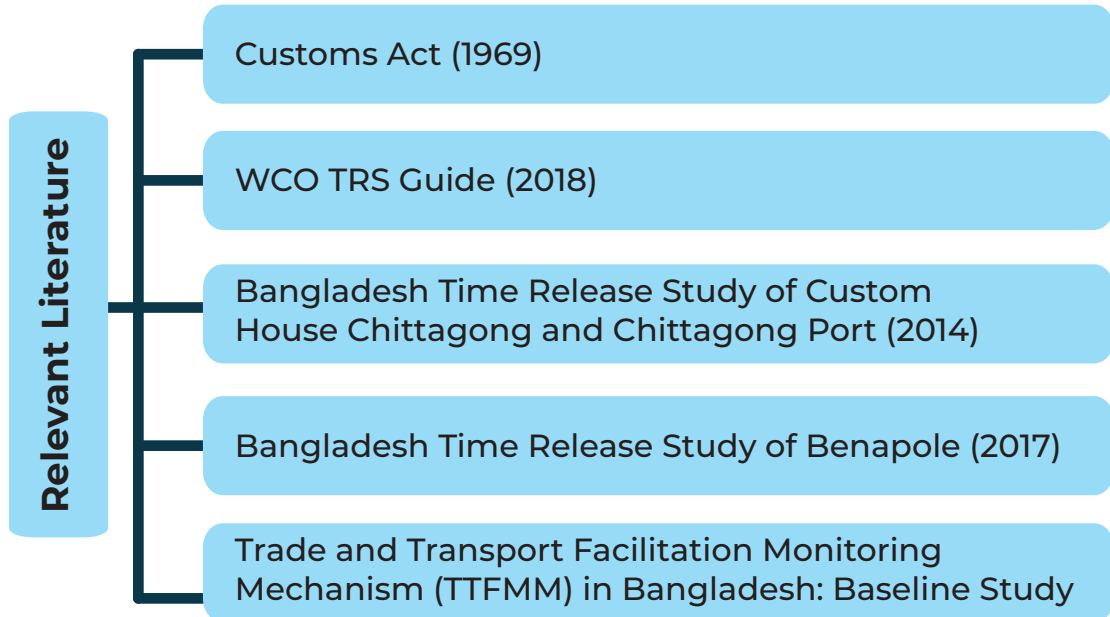
## 3.1 Qualitative Approach

Qualitative data helps provide information that may otherwise be difficult to gain from purely quantitative surveys. Utilizing a qualitative approach, in addition to a quantitative approach, helps researchers to better understand the overall business processes at the ports, develop tailored survey questionnaires, understand problems and discrepancies experienced, and provide recommendations. The team's approach included a desk review of relevant information, described in the following section, and a review of secondary data in the form of Key Informant Interviews (KIIs) and Focus Group Discussions (FGDs).

### 3.1.1 Desk Review and Secondary Data Analysis

The team reviewed relevant government orders, documents, literature, and data sets to gain an understanding of the Customs clearance process, the average amount of cargo handled each year in the selected ports, the conditions for trade in agricultural items, the documents required for exports and imports, the availability of testing facilities, and Customs regulations at the three ports. Through the desk review, the team was able to develop business process maps and tailored questionnaires and checklists incorporating the relevant time-related parameters for each of the three ports. Table 1 contains a list of sources consulted in development of this TRS.

## Table 1: Relevant Literature Consulted



## 3.1.1 Desk Review and Secondary Data Analysis

Mid-Term Performance Evaluation of the Bangladesh Trade Facilitation Activity (2018)

Secondary data retrieved from ASYCUDA World

WTO Trade Facilitation Agreement

Websites of respective Custom Houses and port authorities

India's National Time Release Study 2021

Relevant journal and newspaper articles

## 3.1.2 Key Informant Interviews (KIIs)

KIIs are an important qualitative research tool used to complement quantitative findings. As a part of the primary data collection, the team conducted 13 KIIs at the Chattogram seaport, 11 KIIs at the Dhaka airport and 8 KIIs at the Benapole land port with relevant stakeholders of the respective ports and Custom Houses (Table 2). This includes Deputy Commissioners, Joint Commissioners, Assistant Commissioners, C&F agent leaders, managers of the port authorities, Customs Sircars, Revenue Officers (ROs), Assistant Revenue Officers (AROs) of assessment groups (who are dedicated to handling Customs assessment of agricultural and food products), and officers of the counterpart agencies.

Through KIIs, the team was able to obtain information on the time required for the clearance of goods, identify bottlenecks to cross-border trade, including duplicative processes, and explore capacity constraints at border authorities. The KIIs provided insights into the roles of counterpart agencies in the Customs clearance process for agricultural commodities, particularly for those agencies (BSTI, BCSIR) for which the team did not identify a large volume of samples requiring their clearance.

**Table 2 : Stakeholders for the KIIs**

**CHATTOGRAM SEAPORT**

<b>NO.</b>	<b>DESIGNATION</b>	<b>ORGANIZATION</b>
<b>1.</b>	Head and Chief Scientific Officer	Bangladesh Atomic Energy Commission
<b>2.</b>	Joint Commissioner	Chattogram Custom House
<b>3.</b>	Terminal Manager	Chattogram Port Authority
<b>4.</b>	Deputy Commissioner	Chattogram Custom House
<b>5.</b>	Assistant Revenue Officer (ARO)	Chattogram Port
<b>6.</b>	Secretary-General	Chattogram C&F Agents Association
<b>7.</b>	Assistant Commissioner	KDS off-dock (Private Inland Container Depot)
<b>8.</b>	Senior Scientific Officer	BCSIR
<b>9.</b>	Principal Scientific Officer (Officer in Charge)	BCSIR
<b>10.</b>	Assistant Revenue Officer(ARO) - Section 1A	Chattogram Custom House
<b>11.</b>	Assistant Revenue Officer(ARO) - Section 1B	Chattogram Custom House
<b>12.</b>	Assistant Revenue Officer(ARO) - Section 1B	Chattogram Custom House
<b>13.</b>	District Livestock Officer	DLS

## DHAKA AIRPORT

<b>NO.</b>	<b>DESIGNATION</b>	<b>ORGANIZATION</b>
<b>1.</b>	Deputy Commissioner	Dhaka Custom House
<b>2.</b>	Deputy Assistant Quarantine Officer	PQW office, HSIA
<b>3.</b>	Fisheries Quarantine Officer	DoF office, HSIA
<b>4.</b>	Livestock Quarantine Officer	DLS office, HSIA
<b>5.</b>	President	Dhaka Customs Agents Association (DCAA)
<b>6.</b>	Senior Scientific Officer	BCSIR
<b>7.</b>	Principal Scientific Officer	BCSIR)
<b>8.</b>	Customs Sircar	Handling imports of perishable commodities
<b>9.</b>	Customs Sircar	Handling exports of perishable commodities
<b>10.</b>	Assistant Revenue Officer (ARO)	Dhaka Custom House
<b>11.</b>	C&F agent	N.U.H BD LTD



## BENAPOLE LAND PORT

NO.	DESIGNATION	ORGANIZATION
1.	Deputy Commissioner	Benapole Custom House
2.	Revenue Officer (RO), Assessment Group 1	Benapole Custom House
3.	Assistant Revenue Officer (ARO), Assessment Group 1	Benapole Custom House
4.	Assistant Revenue Officer (ARO), Examination	Benapole Custom House
5.	Revenue Officer (RO), Export	Benapole Custom House
6.	Senior Scientific Officer	Benapole C&F Agents Association
7.	General Secretary	BCSIR)
8.	Chief Scientific Officer	BAEC

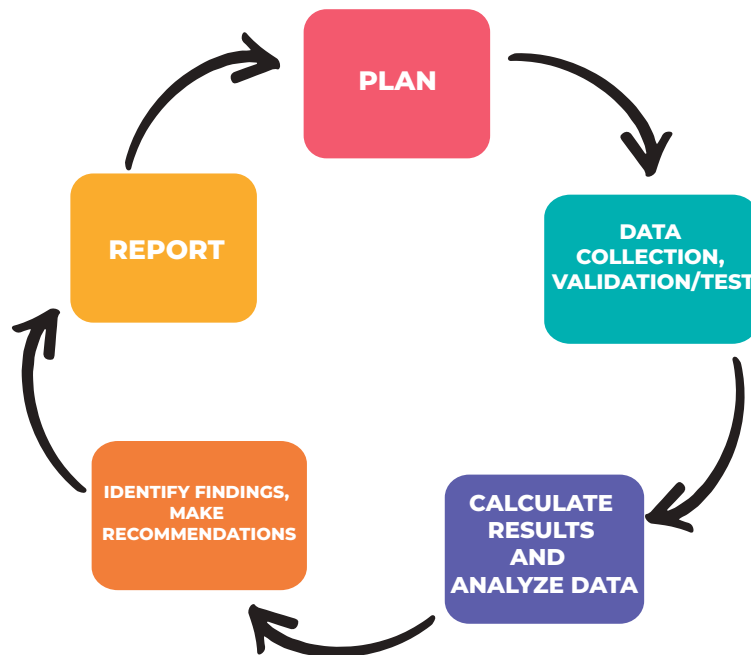
### 3.1.3 Focus Group Discussions (FGDs)

Two significant objectives of this study were to evaluate the role of the five plus one counterpart agencies in the Customs clearance process for agricultural commodities and foodstuff and to provide recommendations to increase the efficiency of import and export clearance processes. The research team conducted two FGDs at each of the ports, one with the leaders of the C&F agents and another with the Customs sircars. The team gained useful insights from these FGDs including deeper insights into the locations of counterpart agency testing labs and the impact on the clearance process, infrastructure and technological issues contributing to delays, and the implications of operating hours at border authorities. This information complemented the KIIs and provided further insights into the timing of clearance of goods, common issues experienced, and the roles of the counterpart agencies in each location.

## 3.2 Quantitative Approach

The team utilized the WCO TRS Guide to help guide the study, presented in Figure 1: TRS cycle.

**Figure 1: TRS cycle**



Source: WCO TRS Guide (2018)

## 3.2.1 Planning, Questionnaire Development and Process Mapping

The research team worked closely with relevant authorities at the three Custom Houses and with other stakeholders, including the Dhaka Customs Agents Association (DCAA) and the Civil Aviation Authority of Bangladesh (CAAB), to finetune the approach of data collection. The research team developed questionnaires for each location building on questionnaires used in previous TRS studies, where available. The team visited import and export cargo villages and communicated with C&F agents and Customs sircars in each port to inform the development of the questionnaires. The team then visited the three ports to validate the questionnaires and to map the business clearance process for imports and exports. After the questionnaire was finalized, the team carried out the TRS at each of the three ports. The questionnaires were continually amended and improved upon throughout the TRS process.

At the Benapole land port, the team received an adequate amount of completed questionnaires during the timeframe of seven working days. At Chattogram, the number was less. Therefore, the team utilized bills of entry and bills of export provided by C&F agents for the entire month of January 2022 to compensate for the low response rate. At the Dhaka airport, the team also received a low number of completed questionnaires in the first seven working days. Therefore, the team utilized bills of entry and bills of export collected by C&F agents during the second half of January 2022 to increase the sample size.

The team mobilized enumerators to ensure the completion of questionnaires by the C&F agents and Customs sircars. The sample questionnaires utilized in all three ports are provided in Appendix (A). Detailed business process maps for the import and export clearance processes of all the three ports are provided in Appendix (B).

## 3.2.2 Briefing and Sensitization Workshops

The research team conducted briefing and sensitization workshops with officials at the three ports. At the Benapole and Chattogram ports, the workshops were led by senior officials (Joint Commissioners of Customs). At the Dhaka airport, the workshops were led by a representative of the Customs Modernization Desk of the NBR. These workshops were attended by the relevant authorities, including representatives from Custom Houses, representatives from the counterpart agencies, ROs and AROs, members of the C&F agents association, and Assistant Commissioners and Deputy Commissioners of Customs. The research team presented the TRS methodology and sought desired cooperation from the counterparts and distributed questionnaires at the workshops.

As the team experienced difficulties gathering completed questionnaires for the Dhaka Airport, the team continued to sensitize C&F leaders and agents that handle agricultural commodities, perishable items, and foodstuffs to increase participation in order to meet the study's objectives.

## 3.2.3 Training and Piloting

The research team conducted briefing and sensitization. The team conducted a two-day training for enumerators. During this training, enumerators were informed about the import and export business processes of each port and trained to understand the questionnaires. After training was complete, the questionnaires were piloted at each port. The information gathered during the pilot phase was included in the study's sample as the questionnaires were also completed during the sample timeframe.



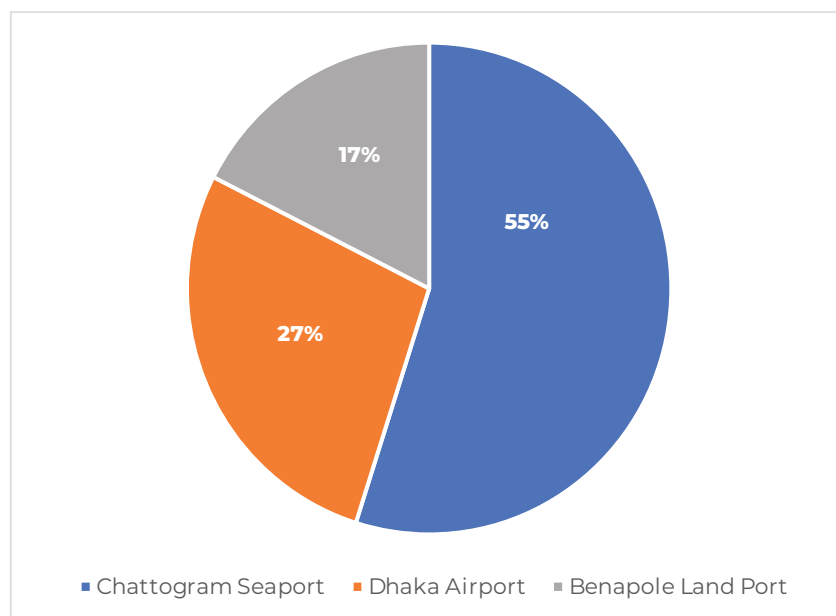
## 3.2.4 Sampling and Sample Size

Bills of entry and bills of export for products classified in HS chapters 1-24 were targeted in all three ports.

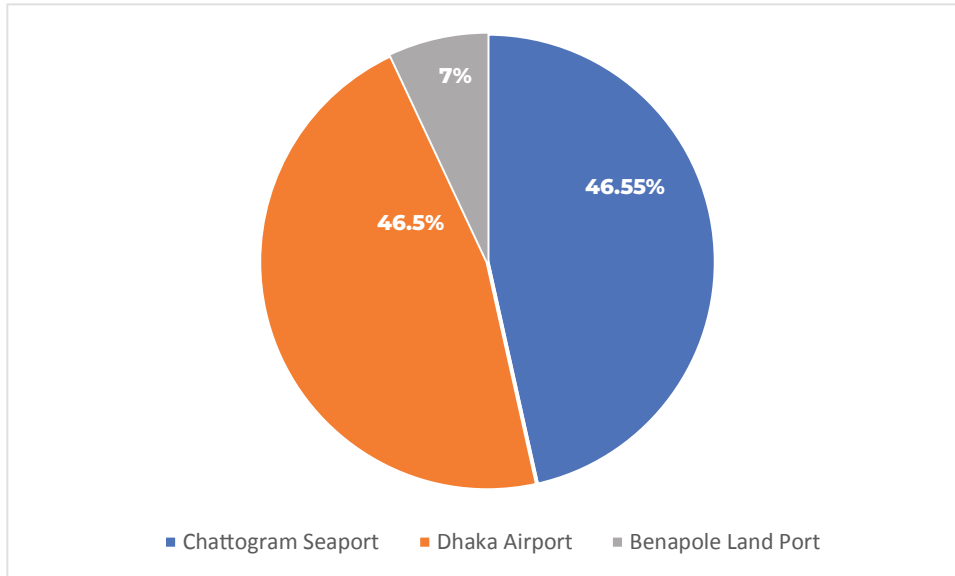
At the **Benapole land port**, data collection was carried out over a period of seven working days. Questionnaires were distributed for the bills of entry and bills of export. The sample of bills of entry contained fresh fruits, fresh vegetables, animal feed and fish, which involved certifications from PQW, DLS, and DoF. To include samples for the remaining counterpart agencies, the team requested bills of entry requiring clearance from BSTI and BCSIR. These were difficult to identify so the team gathered samples of bills of entry requiring BSTI and BCSIR certification from outside of the sampling period (spanning July to November 2021). A total of 68 completed questionnaires were collected on the bills of entry. However, only 55 of the completed questionnaires could be utilized as the other 13 questionnaires could not be verified against the ASYCUDA data.

34 relevant bills of export were submitted during this period; 33 were frozen fish and the remaining one was cashew nut. Enumerators were able to record the information for 15 bills of export. This number may seem small; however, the total amount of exported items was relatively low at that time. As nearly all of the bills of export were for the same product category, the average time calculations from these 15 export questionnaires are likely to represent the timing of all 34 bills of export.

**Figure 2: Sampled Bills of Entry**



**Figure 3: Sampled Bills of Export**



For the **Chattogram seaport**, the initial plan was to collect the bills of entry and export questionnaires during seven working days in January 2022. However, due to the low number of responses received from Customs and jetty sircars, the team expanded the period to the entire month of January. During January, 3,063 bills of entry were submitted for food and agricultural products. Of the 200 questionnaires received from the Customs and jetty sircars, 185 samples were deemed acceptable to be utilized for the analysis.<sup>23</sup> The 185 sample bills of entry represent a statistically valid sample based on the actual number of bills of entry (3,063) resulting in a 95 percent level of confidence with a seven percent margin of error. The sample of bills of entry included the clearance times for all counterpart certification agencies except for BCSIR.

During the January 2022 survey period, 1,262 bills of export were submitted for products classified against HS chapters 1-24. After unfilled questionnaires and those with anomalous information were eliminated, the analysis was based on 100 complete questionnaires. The 100 bills of export results in a 90 percent confidence interval and an eight percent margin of error. The sample of bills of entry and bills of export from Chattogram seaport included fresh fruits, vegetables, frozen fish, spices, potato chips, French fries, corn chips, and animal feed.

For the **Dhaka airport**, the initial plan was to collect the bills of entry and export questionnaires during seven working days. However, due to the low number of completed questionnaires, the team expanded the period to 16 days (from January 16-31, 2022). During the study period, 683 bills of entry were submitted for food and agricultural products. 102 questionnaires were received from Customs Sircars, out of which 93 samples were deemed acceptable for final analysis after unfilled questionnaires and those with anomalous information were eliminated. These 93 sample bills of entry represent a statistically valid sample resulting in a 90 percent confidence interval with an eight percent margin of error. The sample bills of entry included the clearance time of all counterpart certification agencies except for DLS. However, the information on the bills of entry that require certification from BSTI, BCSIR, and BAEC were outside the survey period (ranging from November 2021 to February 2022).

<sup>23</sup> 15 of the questionnaires could not be used due to anomalous information. Incomplete questionnaires were not used for the analysis.

During the survey period, 778 bills of export were submitted for products classified against HS chapters 1-24. 110 questionnaires were collected by enumerators, out of which 100 samples were deemed acceptable to be utilized for analysis after unfilled questionnaires and those with anomalous information were eliminated. The 100 sample bills of export represent a statistically valid sample with a 90 percent confidence interval and an eight percent margin of error. The sample of bills of entry and bills of export included fresh fruits, vegetables, live and chilled fish, crab and lobster, betel leaves, dairy products, coffee, tea, cocoa, cereals, seeds, and animal feed.

As the report provides agency-specific clearance time, for calculating agency-wise time, no. of certifications provided by each agency for clearing the respective no. of bills of entry were considered. Hence, no. of samples i.e., bills of entry and no. of agency-specific samples vary as clearing a product under a single bill of entry might require multiple certifications from multiple agencies.

## 3.2.5 Data Analysis and Result Calculation

The team analyzed data from the completed questionnaires that were verified with ASYCUDA to determine the average time required to complete each step of the clearance process and the overall time required to clear the good from the point of entry to release. The average clearance time could not be calculated due to a limited number of samples for some counterpart agencies, and due to the samples being collected outside the timeframe for this study. To the extent possible (based on the availability of samples), the analysis provided information on the average time required for receiving clearance from counterpart agencies.



## 3.2.6 Findings and Recommendations

The findings and recommendations were developed with consideration of information gathered from questionnaire surveys, KIIs, FGDs, and data from ASYCUDA World. The research team identified significant issues that require interventions from the government and NBR to reduce the overall clearance times for both imports and exports at the three ports.

## 3.2.7 Validation of Findings

The findings, calculated times as well as the recommendations proposed were shared and validated with all relevant stakeholders. Three Validation Workshops at the three ports i.e., Chattogram Seaport, Dhaka Airport and Benapole Land Port were organized where all the agro-trade related agencies, port authorities, NBR, C&F Agents, C&F Employees, shipping agents, freight forwarders, private sector representatives, bank representatives etc. participated and shared their views and experiences. Inputs from the validation workshop were incorporated in the findings and recommendations.





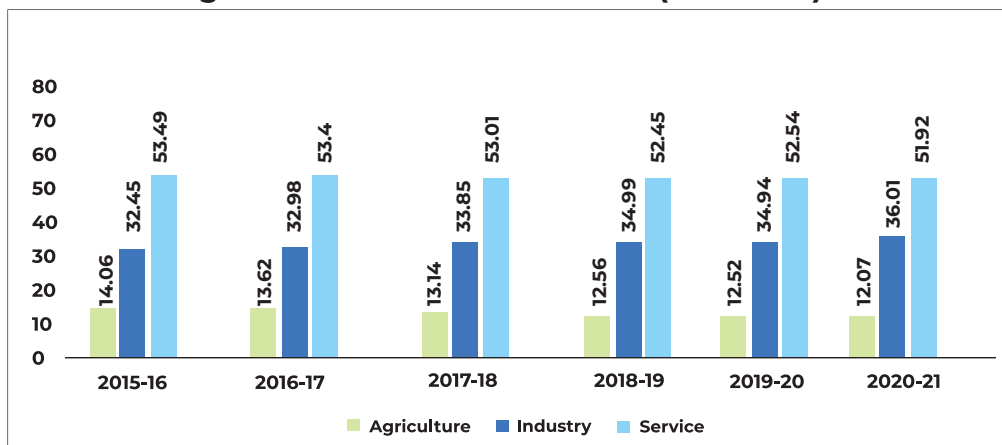


**4**

**OVERVIEW OF  
THE AGRICULTURAL  
SECTOR IN BANGLADESH**

The agriculture sector's contribution to Gross Domestic Product (GDP) has diminished over the last decade despite remaining a predominant source of employment. In FY 2015-16, agriculture comprised 14 percent of Bangladesh's GDP, but that steadily declined to 12 percent by FY 2020-21 (Figure 2).

**Figure 4: Sectoral share of GDP (% of total)**



Source: Bangladesh Bureau of Statistics (BBS)

The agricultural sector is divided into four sub-sectors: crops and horticulture; animal farming; forestry and related services; and fishing. Of the four sub-sectors, crops and horticulture have consistently remained the largest contributor to the agricultural sector's contribution to GDP (Table 3).

**Table 3: Agricultural sub-sectoral share of GDP**

	2015-16	2016-17	2017-18	2018-19	2019-20	2020-21
Agriculture, forestry and fishing	14.06	113.62	13.14	12.56	12.52	12.07
Crops & horticulture	6.96	6.68	6.39	6.04	5.96	5.70
Animal Farming	2.35	2.26	2.17	2.07	2.06	1.98
Forest and related services	1.87	1.84	1.81	1.76	1.78	1.75
Fishing	2.89	2.84	2.77	2.70	2.71	2.64

Source: Bangladesh Bureau of Statistics (BBS)

Table 4 shows the value of agricultural and food exports by HS chapter, along with the relative importance of such products in Bangladesh's total agricultural exports. Exports of agricultural products totaled \$1.1 billion in 2020.

In 2016, fish and crustaceans were the leading agricultural export category, comprising 63 percent of the total value of agricultural exports. The value of such exports declined between 2016-20, even as Bangladesh's agricultural exports increased. By 2020, exports of fish and crustaceans only accounted for 45 percent of agricultural exports. On the other hand, exports of products such as animal and vegetable fats and oils have been increasing. In 2016, such products accounted for only 1 percent of the value of Bangladesh's agricultural exports. By 2020, such products accounted for nearly 14 percent of the total agricultural export value.

**Table 4: Distribution and percentage of Bangladesh's agricultural product exports**

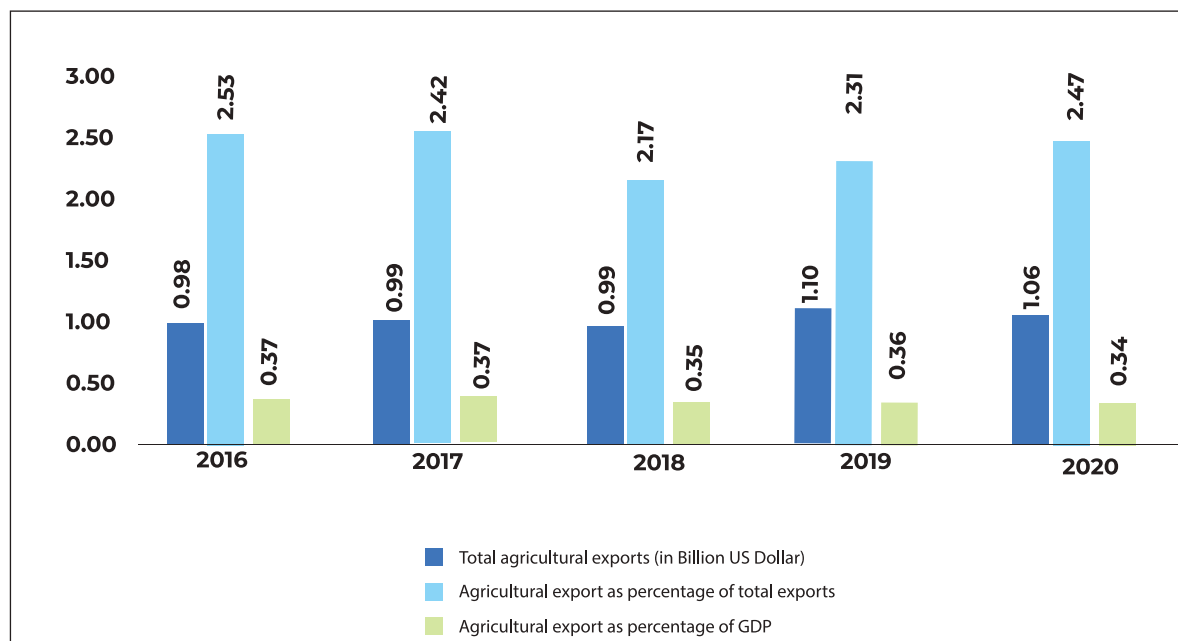
HS Chapter	Product label	Total value (thousand USD)					Percent (% of total agricultural export)				
		2016	2017	2018	2019	2020	2016	2017	2018	2019	2020
01	Live animals	3	5	2	0	4	0.00	0.00	0.00	0.00	0.00
02	Meat and edible meat offal	503	426	984	512	384	0.05	0.04	0.10	0.05	0.04
03	Fish and crustaceans, mollusks and other aquatic invertebrates	612,206	617,294	543,988	543,007	475,672	62.7	62.20	54.96	49.3	44.8
04	Dairy produce; birds' eggs; natural honey; edible products of animal origin, not elsewhere	1,519	842	1,683	4,093	9,865	0.16	0.08	0.17	0.37	0.93
05	Products of animal origin, not elsewhere specified or included	2,774	2,686	2,771	7,586	5,046	0.28	0.27	0.28	0.69	0.48
06	Live trees and other plants; bulbs, roots and the like; cut flowers and ornamental foliage	84	69	153	72	27	0.01	0.01	0.02	0.01	0.00
07	Edible vegetables and certain roots and tubers	51,586	56,143	56,664	46,013	37,525	5.29	5.66	5.72	4.18	3.54
08	Edible fruit and nuts; peel of citrus fruit or melons	26,673	36,891	39,917	20,253	7,841	2.73	3.72	4.03	1.84	0.74
09	Coffee, tea, maté and spices	18,754	24,740	26,169	31,987	39,338	1.92	2.49	2.64	2.91	3.71
10	Cereals	11,128	8,041	9,852	26,697	18,261	1.14	0.81	1.00	2.43	1.72
11	Products of the milling industry; malt; starches; inulin; wheat gluten	1,000	1,326	2,546	2,467	1,597	0.10	0.13	0.26	0.22	0.15
12	Oil-seeds and oleaginous fruits; miscellaneous grains, seeds and fruit; industrial or medicinal etc.	14,843	10,614	10,668	23,465	23,692	1.52	1.07	1.08	2.13	2.23
13	Lac; gums, resins and other vegetable saps and extracts	632	8	3	11	61	0.06	0.00	0.00	0.00	0.01
14	Vegetable plaiting materials; vegetable products not elsewhere specified or included	525	325	554	4,640	7,879	0.05	0.03	0.06	0.42	0.74
15	Animal or vegetable fats and oils and their cleavage products; prepared edible fats; animal etc.	10,928	10,760	22,963	101,839	143,990	1.12	1.08	2.32	9.25	13.57
16	Preparations of meat, of fish or of crustaceans, mollusks or other aquatic invertebrates	18,033	13,076	12,374	12,914	12,052	1.85	1.32	1.25	1.17	1.14
17	Sugars and sugar confectionery	13,032	8,661	9,576	9,078	12,036	1.34	0.87	0.97	0.82	1.13
18	Cocoa and cocoa preparations	1,059	1,946	4,248	3,893	4,925	0.11	0.20	0.43	0.35	0.46
19	Preparations of cereals, flour, starch or milk; pastrycooks' products	35,935	42,520	57,331	71,256	92,250	3.68	4.28	5.79	6.47	8.70
20	Preparations of vegetables, fruit, nuts or other parts of plants	30,424	29,546	28,063	21,903	14,140	3.12	2.98	2.84	1.99	1.33
21	Miscellaneous edible preparations	7,710	5,139	5,803	4,125	4,441	0.79	0.52	0.59	0.37	0.42

22	Beverages, spirits and vinegar	16,931	22,259	25,393	34,454	26,605	1.74	2.24	2.57	3.13	2.51
23	Residues and waste from the food industries; prepared animal fodder	8,000	899	8,315	15,432	9,373	0.82	0.09	0.84	1.40	0.88
24	Tobacco and manufactured tobacco substitutes	91,558	98,260	119,829	115,191	113,844	9.38	9.90	12.11	10.46	10.73
<b>Total</b>		<b>975840</b>	<b>992476</b>	<b>989849</b>	<b>1100888</b>	<b>1060848</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>

Sources: SANEM's calculation based on ITC Trade Map

Over the five-year period from 2016 to 2020, the value of agricultural exports rose slightly, but agricultural products as a share of total exports declined (Figure 3). Agricultural products account for a very small share of Bangladesh's export basket (less than 3 percent).

**Figure 5: Total Agricultural Export Value And Its Share In Total Export And Gdp**



Source: SANEM's calculation based on ITC Trade Map and Bangladesh Bureau of Statistics (BBS)

Table 5 shows the value of agricultural and food imports by HS chapter, along with the relative importance of such products in Bangladesh's total agricultural imports. Imports of agricultural products reached \$8.4 billion in 2020.

By value, cereals comprise the most significant share of Bangladesh's agricultural imports, accounting for 20 percent of such imports in 2020. Over the five year period from 2016 to 2020, imports of cereals increased considerably, from \$1.1 billion to \$1.7 billion. Over this period, imports of oilseeds grew significantly, from \$386 million to \$1.2 billion. Imports of animal or vegetable fats and oils declined slightly over this period, from \$1.5 billion to \$1.3 billion. Such imports declined from 25 percent to only 16 percent of total agricultural imports.

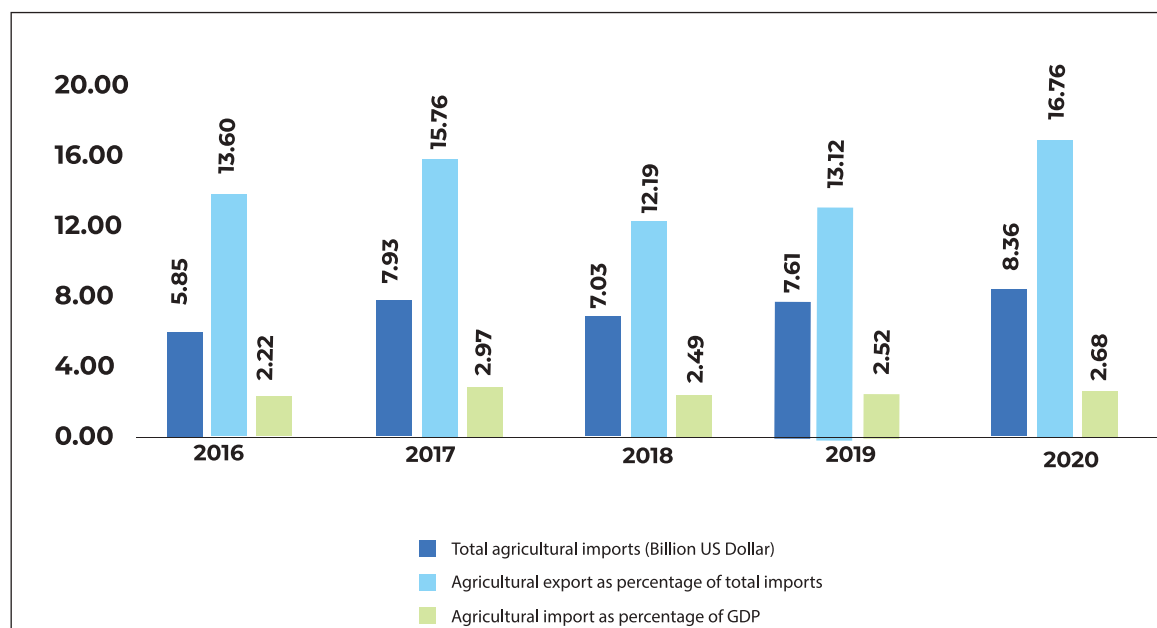
**Table 5: Distribution and percentage of Bangladesh's agricultural product imports**

HS Chapter	Product label	Total value (thousand USD)					Percent (% of total agricultural import)				
		2016	2017	2018	2019	2020	2016	2017	2018	2019	2020
01	Live animals	18,249	24,245	25,598	29,427	24,448	0.31	0.31	0.36	0.39	0.29
02	Meat and edible meat offal	1,192	4,047	8,032	21,289	18,731	0.02	0.05	0.11	0.28	0.22
03	Fish and crustaceans, mollusks and other aquatic invertebrates	42,740	46,491	46,676	82,913	45,065	0.73	0.59	0.66	1.09	0.54
04	Dairy produce; birds' eggs; natural honey; edible products of animal origin, not elsewhere etc.	248,006	342,612	374,773	388,158	367,910	4.23	4.32	5.33	5.10	4.40
05	Products of animal origin, not elsewhere specified or included	32,290	28,052	40,482	55,967	41,774	0.55	0.35	0.58	0.74	0.50
06	Live trees and other plants; bulbs, roots and the like; cut flowers and ornamental foliage	802	1,116	961	798	978	0.01	0.01	0.01	0.01	0.01
07	Edible vegetables and certain roots and tubers	628,716	554,733	523,486	754,201	835,613	10.74	6.99	7.44	9.91	9.99
08	Edible fruit and nuts; peel of citrus fruit or melons	316,221	354,198	370,952	529,920	722,161	5.40	4.46	5.27	6.96	8.64
09	Coffee, tea, maté and spices	165,930	186,016	216,225	316,702	510,530	2.83	2.34	3.07	4.16	6.11
10	Cereals	1,147,374	2,248,140	1,727,743	1,666,799	1,704,169	19.59	28.33	24.56	21.90	20.38
11	Products of the milling industry; malt; starches; inulin; wheat gluten	28,202	26,045	28,704	21,515	20,835	0.48	0.33	0.41	0.28	0.25
12	Oilseeds and oleaginous fruits; miscellaneous grains, seeds, and fruit; industrial or medicinal, etc.	386,406	531,441	609,321	918,932	1,170,695	6.60	6.70	8.66	12.07	14.00
13	Lac; gums, resins and other vegetable saps and extracts	27,724	25,084	26,007	24,929	32,016	0.47	0.32	0.37	0.33	0.38
14	Vegetable plaiting materials; vegetable products not elsewhere specified or included	12,707	5,932	7,454	16,229	14,354	0.22	0.07	0.11	0.21	0.17
15	Animal or vegetable fats and oils and their cleavage products; prepared edible fats; animal etc.	1,461,944	1,652,446	1,742,621	1,302,143	1,347,738	24.96	20.82	24.77	17.11	16.12
16	Preparations of meat, of fish or of crustaceans, mollusks or other aquatic invertebrates	1,430	3,309	5,397	7,023	4,739	0.02	0.04	0.08	0.09	0.06
17	Sugars and sugar confectionery	696,750	1,144,731	585,763	666,059	752,634	11.90	14.42	8.33	8.75	9.00
18	Cocoa and cocoa preparations	14,852	17,212	14,862	15,089	13,970	0.25	0.22	0.21	0.20	0.17

19	Preparations of cereals, flour, starch or milk; pastrycooks' products	84,696	94,196	112,722	128,474	135,400	1.45	1.19	1.60	1.69	1.62
20	Preparations of vegetables, fruit, nuts or other parts of plants	12,958	16,453	17,936	17,618	14,579	0.22	0.21	0.25	0.23	0.17
21	Miscellaneous edible preparations	88,909	83,681	95,207	105,176	102,753	1.52	1.05	1.35	1.38	1.23
22	Beverages, spirits and vinegar	13,259	14,043	17,554	15,237	16,401	0.23	0.18	0.25	0.20	0.20
23	Residues and waste from the food industries; prepared animal fodder	406,925	517,794	422,144	509,343	452,220	6.95	6.52	6.00	6.69	5.41
24	Tobacco and manufactured tobacco substitutes	16,013	12,884	12,545	15,357	10,270	0.27	0.16	0.18	0.20	0.12
<b>Total</b>		<b>5856311</b>	<b>7936918</b>	<b>7035183</b>	<b>7611317</b>	<b>8362003</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>	<b>100</b>

The value of agricultural imports has increased over the past five years, although it has fluctuated (Figure 4). The share of agricultural imports in terms of total imports reflects this fluctuation, but also rose over the period to nearly 17 percent. Compared with exports, agricultural products make up a relatively large share of Bangladesh's total imports.

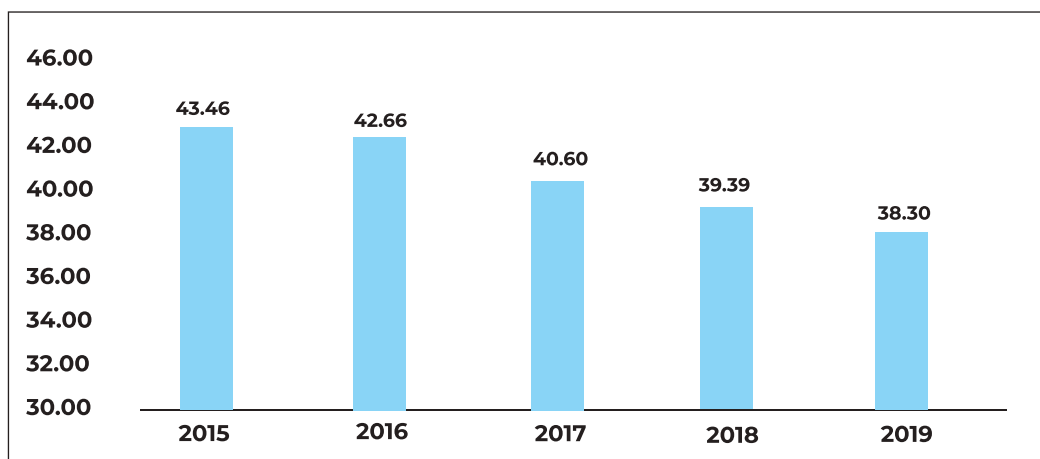
**Figure 6: Total agricultural import value and its share in total import and GDP**



Source: SANEM's calculation based on ITC Trade Map and Bangladesh Bureau of Statistics (BBS)

The percentage of the workforce engaged in the agricultural sector has steadily declined from 2015 to 2019 (Figure 5). Despite the declining trend, agriculture continues to employ a majority of the country's workforce, just over 38 percent in 2019.

**Figure 7: Employment in agriculture (% of total employment)**



Source: International Labor Organization, ILOSTAT database

**5**

# DETAILED TRS REPORT ON THE CHATTOGRAM SEAPORT





# Detailed TRS Report on the Chattogram Seaport



## 5.1 Overview of the Chattogram Seaport

Chattogram seaport is the largest seaport in Bangladesh and processes nearly 90 percent of total import cargos and 85 percent of total export cargos passing through the country<sup>24</sup>. The Chattogram Port Authority (CPA) manages the port and provides the required services and facilities to port users. The Chattogram port focuses on containerized manufactured goods such as clothes, jute and jute items, leather products, fertilizers, seafood, and raw materials. Chattogram is linked to Bangladesh's inland network of waterways, highlighting the port's importance to the country's economy. Dry cargo from the port is transported throughout the country through this network, along with roads and railways.



Chattogram Custom House is one of the Indian subcontinent's oldest Custom Houses. It has contributed significantly to Bangladesh's economy, generating approximately BDT 51,577 crore (5.98 billion USD) in revenues in FY 2020-21. The primary imports passing through Chattogram Custom House are grains, cement, gasoline, sugar, salt, fertilizer, iron, and chemicals. Garments, jute and jute goods, hides and skins, tea, naphtha, molasses, frozen fish, shrimp, and fertilizer are among the leading export products.

<sup>24</sup> Rattri, F. (2018). Impact of Chittagong port development on the economy of Bangladesh. Bangladesh Marine Academy.

<sup>25</sup> Ctg Customs logs Tk 51,577cr in revenues for first time | The Daily Star

## 5.1.1 Customs processing of Agricultural Commodities through Chattogram Seaport and Chattogram Custom House

This section includes the overall business process map for importing and exporting agricultural commodities through the Chattogram seaport.

### IMPORTS

The primary procedures involved in importing goods in Chattogram include Import General Manifest (IGM) Processing, assessment, and physical examination, outpass creation, payment of duty, port authority clearance, and release. The business process map diagram can be found in Appendix (B1). The 27 steps in the import process are summarized in Table C-1.

**Table C-1: Steps of formalities of import processing at the Chattogram seaport**

Step 1	Manifest submitted online to Customs
Step 2	Customs registers IGM information in ASYCUDA and manifest given to C&F Agent
Step 3	C&F agent submits bills of entry in the ASYCUDA system online
Step 4	C&F agent submits hard copy of the bill of entry and other documents to RO for assessment
Step 5	RO marks the file and sends it to the designated ARO (Assessment)
Step 6	ARO (Assessment) checks documents and marks files for examination if selected or necessary
Step 7	C&F agent submits the file to folder exit room where dispatch number is created
Step 8	C&F agent submits documents to the joint commissioner at jetty and documents referred to appropriate off-dock (if off-dock procedure applicable)
Step 9	C&F agent obtains the location of the goods from the port authority and advises Customs accordingly
Step 10	Assistant commissioner (Customs) assigns examining officer
Step 11	C&F agent submits documents to the examining officer and verbally receives examination time
Step 12	C&F agent moves to the indent section of the port authority and arranges to keep down cargo
Step 13	The examination officer collects samples for the examination
Step 14	Inspection by the OGA (simultaneously)
Step 15	Scanning of goods (if required)
Step 16	Examination report submitted and documents send to RO (Assessment)
Step 17	RO marks the file and sends it to the designated ARO
Step 18	ARO checks the document and sends it to RO
Step 19	RO sends the file to AC and above if required

Step 20	The file received by ARO from RO
Step 21	RO approves assessment and assessment notice printed
Step 22	C&F agent submits documents in the "Outpass" section
Step 23	C&F agent pays duty at the bank and submits endorsed assessment notice to ARO (Assessment)
Step 24	C&F agent collects delivery orders from the shipping agent
Step 25	C&F agent pays port dues and gives indent to the port authority for cargo release
Step 26	The car enters the yard and de-stuffing containers and loading in truck
Step 27	The truck exits the gate

## EXPORTS

As discussed in the key findings, the export business process is simpler than the import process. While there are nearly the same number of steps involved in importing and exporting, each of the 24 export processes steps detailed in Table C-2 below are less complicated than the processes required for imports. In general, imported goods are subjected to more frequent examinations than exports. The business processes map for exports is presented in a diagram in Appendix (B2). The export process involves an assessment, a payment of applicable fees, off-dock procedures, physical examination of the cargo, port authority procedures, and the release and export of the cargo.



**Table C-2: Steps of export processing  
at the Chattogram seaport**

Step 1	Arrival of cargo at the depot/off-dock
Step 2	C&F agent submits bill of export online, prepares hard copy of the file (folder), and submits to ARO for assessment
Step 3	ARO endorses the bills of export and supporting documents and refers files to RO (Assessment)
Step 4	RO approves assessment and prints assessment notice
Step 5	C&F agent pays applicable fees at the bank (online possible)
Step 6	C&F agent obtains the truck manifest, submits it to the off-dock clerk and a serial number is assigned
Step 7	C&F presents the serial number at the entrance and the truck enters the off-dock
Step 8	Unloading of truck commences
Step 9	C&F agent submits bills of export and supporting documents to the desk clerk at off-dock
Step 10	The desk clerk endorses the quantity and returns the file to the C&F agent
Step 11	C&F submits the document to off-dock Customs
Step 12	ARO at off-dock receives a file with supporting documents, draws sample, and commences examination
Step 13	ARO approves examination and refers file to RO for approval
Step 14	RO approves examination, endorses bills of export, and refers file to AC, if necessary
Step 15	C&F agent pays off-dock dues (online possible)
Step 16	Off-dock desk clerk advises shipping agent that cargo available for export
Step 17	Stuffing of cargo commences in presence of Customs, and cargo is sealed
Step 18	Off-dock submits stuffing report and bills of export to the shipping agent
Step 19	Shipping agent submits hard copy of the document to feeder operator
Step 20	The feeder operator submits documents to the terminal manager
Step 21	Terminal manager verifies documents, issues gate pass, and permits loading container on designated vessel
Step 22	The container arrives at the port entry gate and ARO verifies release in ASYCUDA
Step 23	Container loaded in the vessel
Step 24	Shipping agent obtains clearance from Customs and port authority

*Source: SANEM's assessment*



## 5.2 Findings from Chattogram Seaport

### 5.2.1 Processing Time by Phase

This section includes the time taken to complete each step of the import and export clearance processes at the Chattogram seaport. Imports are discussed first. Out of 3,064 bills of entry submitted for food and agricultural imports during the survey period (January 1-31, 2022), 185 bills of entry included complete information and were verified with ASYCUDA World data. These 185 bills of entry were utilized to calculate the average time duration and covered fresh fruits, vegetables, spices, frozen fish, processed foods (such as Horlicks, chips, sauce, biscuits, canned foods), and animal feed. The number of certifications considered to calculate agency-specific timing for clearing the products under the sampled 185 bills of entry were 305.

The average time required to complete the overall import clearance procedure, starting from the time of arrival of the ship to the release of the cargo/container is on average 7 days 7 hours and 58 minutes (minimum 1 day 1 hour 30 minutes, and maximum 19 days 9 hours).



The average time required to complete the import clearance procedure starting from the discharge of the container from the vessel to the release of the cargo/container is on average 7 days and 44 minutes (minimum 18 hours and 30 minutes, and maximum 19 days 6 hours and 50 minutes). The average time at each point of the import clearance process is listed in Table C-3.

**Table C-3: Average, minimum, and maximum time required for completing individual steps of the import clearance process at the Chattogram seaport**

Interval	Avg Time	Min Time	Max Time	Comments
<b>1. Ship Berthing and port processing</b>				
1.1. The arrival of ship TO discharge of containers <sup>26</sup>	6 hours 35 minutes 27 seconds	1 hour 18 minutes	86 hours 50 minutes	184 samples
<b>2. If off-dock processing</b>				
2.1. Cargo leaving for off-dock TO cargo received at off-dock				No samples identified
<b>3. Manifest processing</b>				
3.1. Manifest approved online TO Customs enters manifest information in ASYCUDA	14 hour 26 minutes 58 seconds	5 minutes	191 hours 35 minutes	184 samples
3.2. If Manifest is rejected, Time of manifest rejection TO amendment of manifest and submission of manifest in IGM section				No samples identified
<b>4. Assessment</b>				
4.1. C&F agent submits a hard copy of the file with the bill of entry and supporting documents to RO TO RO marks file and returns the file to the C&F agent for submission to the designated ARO	10 minute 42 seconds	Less than a minute	1 hour 45 minutes	185 samples
4.2. C&F agent submits the file to ARO TO ARO marks the file for examination and returns the file to the C&F agent	15 minutes 9 seconds	Less than a minute	1 hour 10 minutes	171 samples
<b>5. Examination</b>				
5.1. C&F agent submits the file to the folder exit room TO Dispatch number and file created	9 minute 28 seconds	Less than a minute	1 hour	182 samples
5.2. C&F agent submits the file to the AC at Jetty TO File received at off-dock/jetty office	11 minutes 31 seconds	Less than a minute	1 hour 10 minutes	161 samples
5.3. Assistant Commissioner designates examination officer TO C&F agent submits the file to examination officer	12 minutes 31 seconds	Less than a minute	1 hour 10 minutes	183 samples
5.4. Time required for physical examination by Customs designated examination officer	1 hour 34 minutes 41 seconds	20 minutes	4 hours 50 minutes	185 samples
5.5. If OGA is required, the Total time required to complete the OGA examination <sup>27</sup>	17 hours 13 minutes 13 seconds	1 hour 25 minutes	167 hours 50 minutes	185 samples
5.6.A. Total time required to complete	9 hours 20 minutes 34	1 hour 25	44 hours 10	132 samples

<sup>26</sup> Time of berthing of ship to the discharge of the container is estimated. The total time to discharge the entire ship is not considered.

<sup>27</sup> Average of all the testing agencies' timing

5.6.A. Total time required to complete OGA examination if PQW required	9 hours 20 minutes 34 seconds	1 hour 25 minutes	44 hours 10 minute	132 samples
5.6.B. Total time required to complete OGA examination if DoF required	21 hours 36 minutes 42 seconds	1 hour 30 minutes	76 hours 20 minutes	44 samples
5.6.C. Total time required to complete OGA examination if DLS required		1 day	6 days	5 samples
5.6.D. Total time required to complete OGA examination if BSTI required		5 days	6 days	3 samples
5.6.E. Total time required to complete OGA examination if BAEC is required	10 hours 9 minutes 34 seconds	2 hours	52 hours 10 minutes	121 samples
5.7. Completion of the examination to the submission of the examination report to the AC	58 minute 15 seconds	Less than a minute	18 hours 35 minute	179 samples
<b>6. Assessment (after examination)</b>				
6.1. If mis-declaration occurs, time when the appeal to the higher authority/assessment committee is made TO the time when the decision is given by the higher authority		15 minutes	15 minutes	1 sample
6.2. Assessment notice is printed TO RO approves assessment notice	24 minutes 20 seconds	5 minutes	2 hours 15 minutes	185 samples
<b>7. Out Pass Section</b>				
7.1. File submitted to "Outpass" section TO sealed and "Outpass" creation	16 minutes 37 seconds	Less than a minute	1 hour 40 minutes	185 samples
<b>8. Duty payment at the Bank</b>				
8.1. C&F agent submits assessment notice at the bank TO completion of duty payment	22 minutes 22 seconds	Less than a minute	1 hour 40 minutes	160 samples
<b>9. Release order</b>				
9.1. C&F agent submits bank receipt to ARO TO ARO enters payment information and release order is printed	This process is currently non-existent, as most payments are paid online and release information can be directly transferred to the jetty.			
<b>10. Release from the port authority</b>				
10.1. If the amendment is required for LCL cargo, the total time	13 minutes 36 seconds	5 minutes	1 hour 15 minutes	25 samples
10.2. C&F agent submits release and delivery order to the port authority TO Billing clerk calculates the port dues	30 minutes 19 seconds	5 minutes	2 hours 40 minutes	182 samples

10.2. C&F agent submits release and delivery order to the port authority TO Billing clerk calculates the port dues	30 minutes 19 seconds	5 minutes	2 hours 40 minutes	182 samples
10.3. C&F agent pays port dues, total time	11 minutes 21 seconds	Less than a minute	1 hour 5 minutes	184 samples
10.4. C&F agent pays port dues TO release order printed by the port authority	23 minutes 11 seconds	Less than a minute	18 hours 45 minutes	176 samples
10.5. Total time for container de-stuffing and loading to Bangladeshi truck	1 hour 47 minute 23 seconds	30 minutes	4 hours 20 minutes	185 samples
10.6. Container loading ends TO truck moves to exit gate	37 minutes 30 seconds	Less than a minute	3 hours 30 minutes	185 samples
<b>11. Final release</b>				
11.1. If the cargo is checked by the intelligence agency, the total time required	18 minutes	10 minutes	20 minutes	10 samples
11.2. If the red block is applied, the total time required for clearance	No samples identified			
11.3. Truck coming to the exit gate TO release of the truck	2 hours 4 minutes 9 seconds	Less than a minute	5 days <sup>28</sup>	185 samples
<b>12. Total timing</b>				
12.1. Total timing from the arrival of the ship to the release	7 days 7 hours 58 minutes	1 day 1 hour 30 minutes	19 days 9 hours	184 samples
12.2. Total time from the discharge of goods from ship to the release	7 days 44 minutes	18 hours 30 minutes	19 days 6 hours 50 minutes	185 samples

Source: SANEM's calculation from the sample survey



<sup>28</sup> Outlier: Cases when the importer is unwilling to take the waiting truck



As explained earlier, adding the time required in each step of the import procedure will not add up to the overall time because it does not reflect the buffers encountered throughout the process.

Table C-4 provides the average clearance times at the Chattogram seaport by the agencies involved. These calculations exclude buffer timings. The average time required to complete each step of a phase of the import process is aggregated. For instance, if the Customs procedure before the examination has four steps, then the average time to complete each of these four steps is added to get the cumulative average time required to complete that phase.

**Table C-4: Agency-specific timing for the import clearance process at the Chattogram seaport**

Import procedure	Cumulative average time of each step of the phase and procedure	Responsible agency/entities
Port procedure (arrival of the ship to discharge of containers)	6 hours 35 minutes 27 seconds	Chattogram Port Authority
Customs Procedures (Manifest processing) <sup>29</sup>	14 hours 26 minutes 28 seconds	Customs
Customs Procedure (before examination)	25 minutes 51 seconds	Customs + C&F agents
Examination (Customs and port process)	3 hours 6 minutes 26 seconds	Customs+ Port Authority+ C&F agents
Examination (by OGA)	<ul style="list-style-type: none"> <li>• 9 hours 20 minutes on average (where certification of PQW is necessary, 132 samples)</li> <li>• 21 hours 36 minutes on average (where certification of DoF is necessary, 44 samples)</li> <li>• Maximum 6 days, minimum 1 day (where DLS certification is required, 5 samples)</li> <li>• Maximum 6 days, minimum 5 days (where BSTI certification is required, 3 samples)</li> <li>• 10 hours 9 minutes on average (where BAEC certification is required, 121 samples)</li> <li>• 14 days to one month (where BCSIR certification is required, no sample, KIs with stakeholders)</li> </ul>	OGAs (PQW, DLS, DoF, BSTI, BAEC, and BCSIR)
Customs procedure (after examination)	55 minutes 27 seconds	Customs + C&F agents
Banking procedure	13 minutes 21 seconds	Bank + C&F agents
Port authority release and clearance procedure	3 hours 43 minutes 20 seconds	CPA+ trucker
Final release	2 hours 22 minutes 9 seconds	Customs+ Customs intelligence + trucker + importer

*Source: SANEM's calculation from the sample survey*

<sup>29</sup> None of the sample bills of entry that were collected had to go through a manifest correction. If manifest correction is required, then the average time for manifest processing increases significantly.

A total of 1,263 bills of export were submitted during the survey period for products classified against HS chapters 1-24. Of these, 100 bills of export included complete information and were verified against ASYCUDA World data. These 100 bills were utilized to calculate the average time required to complete the export process, which is statistically valid at a 90 percent confidence interval and an eight percent margin of error. The bills of export were primarily for processed foods, fresh vegetables, and frozen fish.

The average time to complete the export clearance process starting from the online submission of the bill of export to the loading of the container in the vessel was **94 hours 38 minutes (3 days 22 hours 38 minutes)**.

The average clearance time once the truck enters the off-dock premises to the loading of container in the vessel was **100 hours 5 minutes**.

For the export procedure, in theory, the bills of export are submitted beforehand and assessed, and then the truck is supposed to enter the off-dock premises. However, in practice, there is time when a truck enters the off-dock premises first, the off-dock (private ICD) procedure starts, and then the bills of export are submitted and assessed.

The time between finishing the overall off-dock process (container stuffing and sealing) and the time when the container reaches the port entry gate averages 3 days. This constitutes buffer time which is unrelated to any particular step of the clearance process. It generally happens due to the unavailability of cargo space on the transport ship.

The average time of a container moving from the port entry gate to being loaded in the vessel was **11 hours and 39 minutes**.

The detailed segment-specific timing for the export process is presented in Table C-5.

**Table C-5: Average, minimum, and maximum time required for completing individual steps of the export clearance process at the Chattogram port**

Interval	Avg Time	Min Time	Max Time	Comments
<b>1. Submission of Bills of Export and preparation of folder from DTI</b>				
1. Bills of export and entry online TO submitting the bills of export by C&F agent and other hard copy to ARO (Assessment)	2 hours 31 minutes 17 seconds	5 minutes	24 hours 40 minutes	100 samples
<b>2. Assessment</b>				
2.1. C&F agents submit the file to the ARO (Assessment) TO ARO initiates an assessment	8 minutes 58 seconds	Less than a minute	2 hours 6 minutes	100 samples
1.1. If an amendment is required, ARO returns the EXP file to the C&F agent for correction TO C&F agent submits the corrected file	(Could not be determined as only one sample was collected)	5 minutes	5 minutes	1 sample
2.3. ARO initiates assessment TO the end of ARO's assessment and returns file to the C&F agent	19 minutes 3 seconds	3 minutes	1 hour 5 minutes	99 samples
2.4. C&F agent submits the file to RO (assessment) TO RO approves assessment and prints assessment notice	17 minutes 15 seconds	3 minutes	2 hours 15 minutes	82 samples
2.A Total time required for Assessment (excluding the online bills of submission step) <sup>30</sup>	54 minutes 59 seconds	10 minutes	4 hours 10 minutes	99 samples
<b>3. Payment of port dues and other necessary fees</b>				
3.1. C&F agent submits documents to the Bank-to-Bank procedure ends	5 minutes 55 seconds	Less than a minute	20 minutes	93 samples
3.2. Bank approves final assessment notice and gives the file back to C&F agent TO sending information electronically to the Customs office for a fee and duty payment by Bank	7 minutes 5 seconds	Less than a minute	45 minutes	92 samples
<b>4. Activities in the OFF-DOCK</b>				
4.1. C&F agent receives truck manifest TO off-dock desk clerk assigns serial number on the manifest	15 minutes 59 seconds	4 minutes	1 hour 10 minutes	100 samples

<sup>30</sup>As bills of export can be submitted online by the C&F agent, this can be done several days in advance of the in-person assessment. The variability of the timing between the submission of the bill of export and the assessment might increase the variance of the overall assessment timing; therefore, this step is excluded while calculating the total time required in the assessment phase.

4.2. C&F agent presents the serial number at the truck entrance point TO entry of the truck to the off-dock region	15 minutes 58 seconds	3 minutes	50 minutes	100 samples
4.3. Arrival of the truck before off-dock premises TO entry of truck in off-dock premises	38 minutes 59 seconds	10 minutes	1 hour 40 seconds	100 samples
4.4. Unloading of truck commences TO unloading of truck ends	1 hour 43 minutes	35 minutes	4 hours 15 minutes	100 samples
4.5. C&F agent submits the bill of export and assessment report to the desk clerk TO desk clerk approves the export amount and gives the file back to the C&F agent	8 minutes 46 seconds	Less than a minute	20 minutes	100 samples
4.6. C&F agent collects the sample and submits it to the ARO for physical examination TO ARO completes the examination	19 minute 31 seconds	5 minutes	45 minutes	100 samples
4.7. ARO completes and approves the examination TO ARO forwards the bills of export to RO	9 minutes 56 seconds	Less than a minute	1 hour 15 second	100 samples
4.8. ARO forwards the bills of export to RO TO RO approves the bills of export and gives them back to the C&F agent	25 minutes 35 seconds	4 minutes	1 hour 44 seconds	99 samples
4.9. C&F agent submits the file to the off-dock Customs officer TO RO approves the bill of export and gives it back to the C&F agent	1 hour 22 minutes 51 seconds	20 minutes	2 hours 40 minutes	99 samples
4.10. If approval of the bill of export by AC is required then ARO forwards the bill of export to RO TO RO approves the bill of export and returns it to the C&F agent				No sample
4.11. C&F agent presents the approved file to the off-dock clerk TO initiation the process of off-dock port payment	8 minutes 17 seconds	Less than a minute	40 minutes	100 samples
4.12. Initiation of the off-dock payment process TO the end of the off-dock payment process	9 minutes 19 seconds	Less than a minute	50 minutes	100 samples
4.13. End the process of off-dock port payment TO giving the receipt copy and file back to the C&F agent	6 minutes 40 seconds	Less than a minute	25 minutes	100 samples
4.14. Beginning of container stuffing in presence of Customs official TO completion of container stuffing and sealing the container in presence of Customs	1 hour 11 minutes	30 minutes	3 hours 30 minute	100 samples

4.15. Completion of container stuffing and sealing of container in presence of Customs TO off-dock sends the bills of export and stuffing report to the shipping agent	1 hour 5 minutes	10 minutes	5 hour 20 minutes	100 sample
4.A. Total time required in off-dock processing starting from the C&F agent receiving the truck manifest TO container stuffing and sending of bill of export and stuffing report to the shipping agent	16 hours 31 minutes	1 hour 55 minutes	50 hours 25 minutes	98 samples
4.B. Total time required in off-dock processing starting from the entry of truck into off-dock premises TO container stuffing and sending of bill of export and stuffing report to the shipping agent	15 hours 52 minutes	1 hour 30 minutes	49 hours 40 minutes	97 samples
<b>5. Release and Export</b>				
5.1. C&F agent submits bill of export and stuffing report TO truck enters port entry gate	3 days	Less than a day	17 days	87 samples
5.2. Truck enters port colony gate TO container loaded in the vessel	11 hours 39 minutes 33 seconds	39 minutes	124 hours	100 samples
<b>Total</b>				
A. Total time of export, starting from bill of export submission to loading of container in the vessel	94 hours 38 minutes	10 hours 24 minutes	420 hours 21 minutes	100 samples
B. Total time of export, starting from the truck entering to off-dock premises to loading of container in the vessel	100 hours 5 minutes	25 hours 24 minutes	424 hours 34 minutes	100 samples

Source: SANEM's calculation from the sample survey.

As explained earlier, adding the time required in each step of the export procedure will not add up to the overall time because it does not reflect the buffers encountered throughout the process.

Table C-6 provides agency-specific average export clearance timing for the Chattogram seaport. The following time calculations exclude buffer timings. The average time required to complete each step of a phase of the export process is aggregated.

**Table C-6: Agency-specific timing for the export clearance process at the Chattogram seaport**

Export procedure	Cumulative average time of each step of the phase and procedure	Responsible agency/entities
Customs Procedures (Assessment)	3 hours 21 minutes 23 seconds	Customs + C&F agents
Payment of fees	13 minutes	C&F agents + Banks
Off-dock procedure	8 hours 51 seconds	Customs + C&F agents + shipping agent + trucker + Bank + Off-dock authority
Port authority release and export	11 hours 39 minutes 33 seconds	Shipping agent + CPA

Source: SANEM's calculation from the sample survey.

## 5.2.2 Processing Time by the Counterpart Agencies

The average processing time to receive clearance from the counterpart agencies at the Chattogram seaport is presented in Table C-7. This is measured from the moment the sample is received by the inspecting officer to the moment when a clearance certificate is issued. In Chattogram port, officials from PQW, BAEC, and DoF usually visit the port and collect samples twice per day. Customs sircars noted that samples that are taken by PQW, DoF, and BAEC between 11 am and 12 pm are tested, reports are prepared, and the C&F agents receive their clearance reports between 3 pm and 4 pm, which coincides with the second daily port visit of these officials. The samples taken later in the day, during the afternoon visit, are analyzed and the results are generally provided to C&F agents by the following morning between 11 am and 12 pm. All counterpart agencies have offices near the port area, or at least within the limits of Chattogram city. These calculations are inclusive of holidays, weekends, and end of business hours.



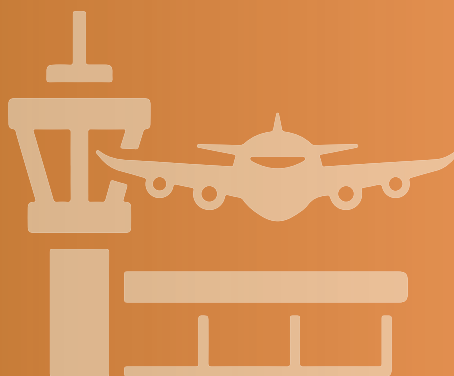
**Table C-7: Average time required to receive clearance from the counterpart agencies at the Chattogram seaport**

Name of the Authority	Average time required to receive clearance	Number of samples	Remarks
PQW	9 hours 20 minutes	132	Customs sircars explained that the samples taken by PQW during the morning (11 am-12 pm) receive their clearance reports by the afternoon visit of PQW. The samples taken later in the day (3-4 pm) receive their testing certificates by the following morning (11 am-12 pm). Sometimes results are delayed due to weekends.
DoF	21 hours 36 minutes	44	Customs sircars explained that the samples taken by DoF during the morning (11 am-12 pm) receive their clearance reports by the afternoon visit of DoF. The samples taken later in the day (3-4 pm) receive their testing certificates by the following morning (11 am-12 pm). Sometimes results are delayed due to weekends.
DLS	Minimum 1 day, Maximum 6 days	5	The average timing is not reported for small samples.
BSTI	Minimum 5 days, Maximum 6 days	3	Based on three samples, which has limitations in reporting an average estimate. However, three KIIs with C&F agents and Customs officials also provide somewhat similar timing of 7 days on average for BSTI clearance at Chattogram port.
BAEC	10 hours 9 minutes	121 samples	Radiation tests on fruits, fresh vegetables, and foodstuffs.
BCSIR	14 days to more than a month	No sample	Based on KIIs with Customs officials, C&F agents, and Customs sircars. This information cannot be interpreted as an average. Very few items are sent to BCSIR. The samples are sent to the Dhaka lab and therefore require more time for certification.

Source: SANEM's Calculation from the sample survey.

# 6

## DETAILED TRS REPORT ON THE DHAKA AIRPORT







## Detailed TRS Report on the Dhaka Airport



### 6.1 Overview of the Dhaka Airport

Hazrat Shahjalal International Airport (HSIA) is one of the main entry points to Bangladesh. The volume of cargo handled by the airport is increasing at an average rate of 10.4 percent per year. In FY 2018-19, HSIA reportedly handled 360,171 tons of cargo, which compares favorably with other airports in developed countries<sup>31</sup>. Recognizing that increasing the capacity of HSIA as is critical to support increasing cargo trade, Bangladesh's Civil Aviation Authority is planning the development of a large cargo village with a new terminal and increased space for office activity (Civil Aviation Authority, Bangladesh)<sup>32</sup>.



<sup>31</sup> Export Thru Shahjalal Airport: Too costly for businesses | The Daily Star

<sup>32</sup> Civil Aviation Authority, Bangladesh. Airport Development History. <http://www.caab.gov.bd/devlprmnts/devhis.html>

## 6.1.1 Customs Processing of Agricultural Commodities through Dhaka Airport and Dhaka Custom House

This section includes the overall business process map for importing and exporting agricultural commodities through the Dhaka airport.

### IMPORTS

The primary procedures involved in importing goods include Import General Manifest (IGM) submission, assessment, and physical examination, payment of duty, and release of the goods from Biman Bangladesh Airlines. The import business process map can be found in Appendix (B3). The 22 steps in the import process are summarized in Table D-1.

**Table D-1: Steps for import processing at Dhaka airport**

Steps	Description
Step 1	IGM Submission (online)
Step 2	Unloading of consignments after the arrival of the plane
Step 3	Consignment transferred to the import village/warehouse
Step 4	Bill of Entry submission (online)
Step 5	C&F agent submits hard copy of file/folder to the ARO (assessment) through ASYCUDA World
Step 6	ARO completes assessment and marks file for examination, if necessary
Step 7	C&F agents submit the hard copy of the file/folder to RO (examination)
Step 8	RO marks the file and assigns an ARO for inspection
Step 9	Inspection by ARO and OGA (if necessary). Simultaneous for OGAs like PQW, DoF, and DLS. Samples are collected and sent to the Dhaka Custom House for OGA certification if clearance is required from BCSIR, BSTI, and BAEC
Step 10	Examination ends, and the file is returned to the C&F agent
Step 11	C&F agent submits the file to the RO (examination) for approval
Step 12	RO approves examination and the file is referred to ARO (assessment)
Step 13	C&F agent submits the file to the ARO (assessment)
Step 14	ARO (assessment) checks file and examination report and refers file to RO (assessment)
Step 15	RO approves assessment and refers file to DC, if necessary
Step 16	File returned to ARO for the printing of the assessment notice
Step 17	C&F agent pays duty at the Bank (online possible) and submits receipt to the ARO
Step 18	ARO issues release order and hands it over to the C&F agent
Step 19	C&F agent submits release order to Biman
Step 20	Biman Bangladesh Airlines checks the release order and the C&F agent pays the necessary fees to Biman Bangladesh Airlines
Step 21	Biman Bangladesh Airlines issues exit note
Step 22	Goods released

**EXPORTS**

The primary procedures involved in exporting goods through Dhaka airport include an assessment, the entry of truck in the export village, physical examination, payment of fees, scanning of goods, and the handover of goods to the airline authority. The export business process map can be found in Appendix (B4). The 21 steps in the import process are summarized in Table D-2: Steps for export processing at Dhaka airport

**Table D-2: Steps for export processing at Dhaka airport**

Steps	Description
Step 1	C&F agent submits bill of export (online)
Step 2	C&F agent submits hard copy of file/folder to ARO (assessment) at the Dhaka Custom House
Step 3	ARO completes the assessment and returns the file to the C&F agent
Step 4	C&F agent submits the file to the RO (assessment)
Step 5	RO approves assessment and prints assessment notice and provides assessment notice to the C&F agent
Step 6	C&F agent moves to cargo village with an assessment notice
Step 7	Biman Bangladesh Airlines issues gate pass and driver's pass
Step 8	The truck enters the export cargo village
Step 9	The weighing of the truck commences
Step 10	Truck unloaded
Step 11	C&F agent submits the file to the RO at the export village
Step 12	RO assigns an ARO for examination
Step 13	Examination ends and reports returned to the C&F agent by the ARO
Step 14	C&F agent submits examination report to the RO
Step 15	RO approves examination and file returned to the C&F agent
Step 16	C&F agent pays Customs administrative fees
Step 17	C&F agent submits documents and asks for scanning permission from the Civil Aviation authority
Step 18	Goods taken for scanning
Step 19	Scanning of goods conducted
Step 20	Air Waybill issued by the airline authority
Step 21	Goods handed over to the airline authority

Source: SANEM's assessment



## 6.2 Findings from the Dhaka Airport

### 6.2.1 Processing Time by Phase

This section includes the time needed to complete each step of the export and import clearance process. Imports are discussed first. Survey data were collected during the period January 16-31, 2022 at Dhaka airport. A total of 683 bills of entry were submitted for products covered under HS chapters 1-24 during this time. Of these, 93 bills of entry contained complete information and were validated against ASYCUDA World. The 93 sample bills of entry were utilized to calculate the average time duration and represent a statistically valid sample, resulting in a 90% confidence interval with an 8% margin of error. Out of the 93 sampled bills of entry, 64 certifications by agencies were considered for calculation along with 13 that were taken from outside of the survey period. The rest bills of entry (29 samples) did not undergo any testing as those were imported as very low scale samples by express courier.

The average time required to complete the overall import clearance process starting from the submission of the bill of entry online to the final release of the goods is **23 hours 24 minutes (minimum 2 hours 30 minutes, maximum of 120 hours 25 minutes)**.

The average time required to complete the import clearance process starting from the submission of hard copy files/folders to the ARO to the release of the goods is **20 hours 58 minutes (minimum 2 hours 10 minutes, maximum 103 hours 30 minutes)**.

The average time required to complete the import clearance process starting from the arrival of the air cargo to the release of the goods is **37 hours 29 minutes (minimum of 4 hours 15 minutes, maximum of 121 hours 30 minutes)**.

The average time required to complete the import clearance process starting from the unloading of the air cargo to the release of the goods is **30 hours 43 minutes (minimum 3 hours 35 minutes, maximum 120 hours 30 minutes)**.

The average time at each point of the import clearance process is included in Table D-3.

**Table D-3: Average, minimum, and maximum time required for completing individual steps of the import clearance process at Dhaka airport**

Interval	Avg Time	Min Time	Max Time	Comments
<b>1. Arrival of Air Cargo</b>				
1.1 Arrival of Air Cargo TO Unloading commences	36 minutes 16 seconds	10 minutes	3 hours 20 minutes	40 samples
1.2 Total time to unload	1 hour 1 minute 3 seconds	25 minutes	1 hour 50 minutes	38 samples
1.3 Total time to shift goods to the Godown <sup>33</sup> of the import village	56 minutes 5 seconds	25 minutes	1 hour 30 minutes	37 samples
<b>2. Assessment in Custom House (Phase 1)</b>				
2.1. Submission of the bill of entry online TO submission of hard copy of file/folder to the designated ARO (assessment)	2 hours 26 minutes 3 seconds	10 minutes	41 hours 39 minutes <sup>34</sup>	93 samples
2.2. ARO commences assessment TO ARO marks a file for examination, if necessary	8 minutes 58 seconds	Less than a minute	1 hour 5 minutes	82 samples
<b>3. Examination</b>				
3.1. C&F agent submits the file to RO (examination) TO RO (examination) refers to an ARO and returns the file to the C&F agent	5 minutes 49 seconds	Less than a minute	30 minutes	91 samples
3.2. File returned to C&F agent TO C&F agent submits the file to the designated ARO (examination)	9 minutes 16 seconds	2 minutes	2 hours	89 samples
3.3. ARO collects a sample for examination TO examination ends and file returned to the C&F agent	1 hour 1 minute 52 seconds	25 minutes	2 hours 10 minutes	59 samples
3.4. Total time required for OGA inspection <sup>35</sup>	49 minutes 53 seconds	25 minutes	2 hours	66 samples

<sup>33</sup> Godown refers to a storage space.

<sup>34</sup> Due to weekends.

<sup>35</sup> This mostly applies to certificates issued by PQW and DoF.

<b>3.4. A.</b> Total time required for OGA inspection, if PQW certification required	52 minutes 3 seconds	25 minutes	1 hour 40 minutes	55 samples
<b>3.4. B.</b> Total time required for OGA inspection, if DoF certification required		25 minutes	50 minutes	9 samples
<b>3.4. C.</b> Total time required for OGA inspection, if BSTI certification required		35 days	35 days	1 sample from November 2021 <sup>36</sup>
<b>3.4. D.</b> Total time required for OGA inspection, if BCSIR certification required		5 days	30 days	6 samples from outside the TRS timeline
<b>3.4. E.</b> Total time required for OGA inspection, if BAEC certification required		2 days	10 days	5 samples from outside the TRS timeline
<b>3.4. F.</b> Total time required for OGA inspection, if DLS certification required	60-120 minutes			No samples were received. Kills with relevant stakeholders.
3.5 File returned to the C&F agent TO C&F agent submits the file to the RO for approval	9 minutes 58 seconds	Less than a minute	1 hour 30 minutes	77 samples
3.6 File submitted to RO TO RO approves examination report and refers file to ARO (assessment) and returns file to the C&F agent	20 minutes 18 seconds	Less than a minute	2 hours	80 samples
<b>4. Assessment (phase 2)</b>				
4.1. C&F agent submits the file to the ARO (assessment) TO ARO (assessment) verifies the examination report and returns the file to the C&F agent	9 minutes 41 seconds	Less than a minute	1 hour	93 samples
4.2. C&F agents receive the file TO submission the file to the RO (assessment) for approval	6 minutes 49 second	Less than a minute	1 hour 20 minutes	88 samples
4.3. File submitted to the RO (assessment) TO RO (assessment) approves the assessment	10 minutes 56 seconds	Less than a minute	1 hour 20 minutes	90 samples
4.4 RO (assessment) approves assessment TO file referred to	5 minutes 17 seconds	Less than a minute	20 minutes	69 samples

<sup>36</sup> Sample from outside the timeframe of data collection in Dhaka. Bill of entry submitted on November 23, 2021; sample sent to BSTI on November 24, 2021; clearance certificate from BSTI issued on December 28, 2021; and certificate received by Dhaka Custom House on December 30, 2021.

4.5. AC/DC approves assessment TO file is sent to the ARO for assessment notice printing	23 minutes 12 seconds	Less than a minute	5 hour 50 minutes	72 samples
4.5 File returned to ARO for the printing of assessment notice TO ARO prints assessment notice and returns file to the C&F agent	10 minutes 38 seconds	Less than a minute	2 hours <sup>37</sup>	89 sample
<b>5. Payment of duties</b>				
5.1. C&F agent commences duty payment TO duty payment ends	7 minutes 11 seconds	Less than a minute	40 minutes	80 samples
5.2. C&F agent submits bank receipt to the ARO TO ARO prints release order	6 minutes 10 seconds	Less than a minute	30 minutes	76 samples
<b>6. Release</b>				
6.1. C&F agent submits release order to Biman Bangladesh Airlines TO port dues are calculated and C&F agent is notified	9 minutes 20 seconds	Less than a minute	1 hour 30 minutes	89 samples
6.2 Port dues calculated TO C&F agent starts bank procedure	8 minutes 5 seconds	Less than a minute	40 minutes	88 samples
6.3. C&F agent pays port dues TO submits bank receipt to Biman Bangladesh Airlines	8 minutes 31 seconds	3 minutes	20 minutes	90 samples
6.3 Document port verification commences TO Document port verification ends	9 minutes 34 seconds	1 minute	1 hour	93 samples
6.4 Document port verification ends TO exit note issued by Biman Bangladesh Airlines	10 minutes 17 seconds	Less than a minute	2 hours 29 minutes	93 samples
6.5 Document port verification ends TO delivery note issued by Biman Bangladesh Airlines	18 minutes 14 seconds	Less than a minute	2 hours 40 minutes	93 samples
6.6 Delivery note issued TO release of good	30 minutes	5 minutes	2 hours	93 samples
<b>Total</b>				
A. Total time of clearance starting from Bills of entry (online) submission TO the release of good	23 hours 24 minutes 3 seconds	2 hour 30 minutes	120 hours 25 minutes	93 samples

<sup>37</sup> Due to a server problem.

B. Total time of clearance starting from submission of hardcopy of file/folder to ARO TO the release of good	20 hours 58 minutes	2 hours 10 minutes	103 hours 30 minutes	93 samples
C. Total time of clearance starting from arrival of Air Cargo TO the release of good	37 hours 29 minutes 13 seconds	4 hours 15 minutes	121 hours 30 minutes	43 samples
D. Total time of clearance starting from unloading (ending) time TO the release of good	30 hours 43 minutes 41 seconds	3 hours 35 minutes	120 hours 30 minutes	38 samples

Source: SANEM's calculation from the sample survey

As explained earlier, adding the time required in each step of the import procedure will not add up to the overall time because it does not reflect the buffers encountered throughout the process.

Table D-4 provides an agency-specific average import clearance process time at the Dhaka airport. The following time calculations exclude buffer timings. The average time required to complete each step of a phase of the import process is cumulative. For instance, if the Customs procedure before the examination has four steps, then the average time to complete each step is added to obtain the cumulative average time required to complete that phase.





**Table D-4: Agency-specific timing for the import Clearance process at Dhaka airport**

Import procedure	Cumulative average time of each step of the phase and procedure	Responsible agency/entities
Air cargo incoming and handling of goods	2 hours 33 minutes 24 seconds	Biman + Civil Aviation Authority
Customs Procedures (before examination)	2 hours 25 minutes 1 second	Customs + C&F agents
Customs Procedure (during examination)	1 hour 47 minutes 13 seconds	Customs + C&F agents
OGA Procedure	<ul style="list-style-type: none"> <li>• 52 minutes 3 seconds (where certification of PQW is necessary, 55 samples)</li> <li>• Maximum 55 minutes and minimum 25 minutes (where certification of DoF is necessary, 9 samples)</li> <li>• On average 1-2 hours (where DLS certification is required, no sample, information from KII)</li> <li>• 35 days for BSTI clearance (only one sample from older file)</li> <li>• Maximum 10 days and minimum 2 days for BAEC certification (5 samples from old files)</li> <li>• Maximum 30 days and minimum 5 days for BCSIR certification (7 samples from old files)</li> </ul>	OGAs (PQW, DLS, DoF, BSTI, BAEC, and BCSIR)
Customs procedure (after examination)	1 hour 6 minutes 33 seconds	Customs + C&F agents
Banking procedure	13 minutes 21 seconds	Bank + Customs + C&F agents
Port authority clearance procedure (post Customs)	1 hour 34 minutes 1 second	Biman + Trucker+ C&F agents
Total time Arrival to final release of good	<ul style="list-style-type: none"> <li>• 23 hours 24 minutes 3 seconds (from bill of entry submission to final release of goods)</li> <li>• 20 hours 58 seconds (from submission of hard copy of file/folder to ARO TO the release of goods)</li> <li>• 37 hours 29 minutes 13 seconds (from the arrival of Air Cargo TO the release of goods)</li> <li>• 30 hours 43 minutes 41 seconds (from unloading (ending) time TO the release of good)</li> </ul>	Customs + Biman + Civil Aviation Authority + C&F agent + Trucker + Bank + OGA

Source: SANEM's calculation from the sample survey

During the survey period, a total of 778 bills of export were submitted for products covered under HS chapters 1-24. A total of 110 questionnaires were received for these bills of export, out of which 100 complete samples were utilized to calculate the average time duration.<sup>38</sup> The 100 sample bills of export used for the analysis represent a statistically valid sample with a 90% confidence interval and an 8% margin of error.

<sup>38</sup> 10 of the questionnaires could not be used due to anomalous information. Unfilled questionnaires were excluded from the analysis.



**Findings related to the export clearance process of Dhaka airport include:**

The average time to complete the export clearance process starting from online submission of the bill of export to the flight leaving with consignments is **47 hours 37 minutes (minimum 6 hours 15 minutes, maximum 318 hours 50 minutes)**.

The average time to complete the export clearance process, starting from the submission of the hard copy of the file/folder to the ARO (assessment) to the flight leaving with consignments is **43 hours 45 minutes (minimum 5 hours 45 minutes, maximum 318 hours 40 minutes)**.

The average time to complete the export clearance process, starting from the entry of the truck at the export cargo village to the flight leaving with consignments is **6 hours 39 minutes (minimum 4 hours, maximum 8 hours 30 minutes)**. The data show that the bills of export are generally submitted and assessed 1 to 2 days earlier than the date of arrival of the truck at the export cargo village. **40 minutes**).

Detailed timings for each phase of the export clearance process are presented in Table D-5

**Table D-5: Average, minimum, and maximum time required for completing individual steps of export clearance process at the Dhaka airport**

Interval	Avg Time	Min Time	Max Time	Comments
<b>1. Submission of Bills of Export and preparation of folder from DTI</b>				
1.1 Bill of export entered in online TO submitting the bill of export by C&F agent and other hard copy to ARO (Assessment)	3 hours 51 minutes 34 seconds	10 minutes	18 hours 50 minutes	100 samples
<b>2. Assessment in Custom House</b>				
2.1. ARO initiates assessment TO ARO approves bill of export and other documents	6 minutes 20 seconds	1 minute	10 minutes	100 samples
2.2. Approved file returns to C&F agent TO C&F agent submits the file to RO (assessment)	5 minutes 46 seconds	Less than a minute	10 minutes	100 samples
2.3. File returns to C&F agent for modification TO RO approves assessment and prints assessment notice (If amendment required)		53 minutes	53 minutes	1 sample
2.4. RO approves assessment and prints assessment notice TO file and assessment notice returned to C&F agent	5 minutes 38 seconds	1 minute	15 minutes	99 samples
2.A. Total time required for Assessment (excluding online submission of bill of export) <sup>39</sup>	38 minutes 12 seconds	10 minutes	2 hours	99 samples
<b>3. Gate Pass Issued and Truck entry into the export village</b>				
3.1. C&F agent applies for gate pass TO Biman issues gate pass	10 minutes 47 seconds	5 minutes	55 minutes	100 samples
3.2. C&F agent applies for driver pass TO Biman issues driver pass	9 minutes 59 seconds	5 minutes	2 hours 5 minutes	100 samples
3.3. Truck stands in queue in front of the gate TO truck enters the cargo village	12 minutes 52 seconds	5 minutes	1 hour 30 minutes	100 samples
3.4. Weighing starts TO weighing ends	10 minutes 22 seconds	5 minutes	21 minutes	99 samples
3.5. Unloading starts TO unloading ends	36 minutes 44 seconds	20 minutes	1 hour 35 minutes	100 samples

<sup>39</sup> As bills of export can be submitted online by the C&F agent, this can be done several days in advance of the in-person assessment. The variability of the timing between the submission of the bill of export and the assessment might increase the variance of the overall assessment timing; therefore this step is excluded while calculating the total time required in the assessment phase.

<b>4. Examination in Export Village</b>				
4.1. C&F agent submits the file to RO at export village TO RO assigns ARO for examination	6 minutes 48 seconds	Less than a minute	20 minutes	100 samples
4.2. ARO starts examination TO Examination ends	9 minutes 5 seconds	1 minute	25 minutes	100 samples
4.3. C&F agent submits the file to RO TO RO approves examination report	5 minutes 34 seconds	Less than a minute	14 minutes	100 samples
<b>5. Scanning by Civil Aviation and Handover to Airline Authority</b>				
5.1. C&F agent submits documents for scanning permission to civil aviation TO scanning permission granted	7 minutes 56 seconds	5 minutes	20 minutes	100 samples
5.2. Scanning process starts TO scanning process ends	17 minutes 47 seconds	5 minutes	1 hour 45 minutes	99 samples
5.3. Scanning process ends TO Air Waybill issued by airline authority	7 minutes 24 seconds	2 minutes	20 minutes	98 samples
5.4. Scanning process ends TO goods handed over to airline authority	15 minutes 57 seconds	9 minutes	35 minutes	99 samples
5.5. Goods handed over to airline authority TO flight leaves	3 hours 50 minutes 35 seconds	2 hours 30 minutes	5 hours 25 minutes	100 samples
<b>Total</b>				
A. Total time of export, starting from bill of export submission (online) TO flight leaving	47 hours 37 minutes 4 seconds	6 hours 15 minutes	318 hour 50 minutes	100 samples
B. Total time of export, starting from hard copy of file/folder submitted for export assessment TO flight leaving	43 hours 45 minute 31 seconds	5 hours 45 minutes	318 hour 40 minutes	100 samples
C. Total time of export, starting from entry of truck to the export village TO flight leaving	6 hours 39 minutes 48 seconds	4 hours	8 hours 30 minutes	100 samples

Source: SANEM's calculation from the sample survey

As explained earlier, adding the time required in each step of the import procedure will not add up to the overall time because it does not reflect the buffers encountered throughout the process.

Table D-6 provides the timing for agency-specific export clearance processes at Dhaka airport. The following time calculations are exclusive of buffer timings. The average time required to complete each step of a phase of the export process is cumulative.

**Table D-6: Agency-specific timing for the export clearance process at the Dhaka airport**

Export procedure	Cumulative average time of each step of the phase and procedure	Responsible agency/entities
Customs Procedures (before examination)	4 hours 9 minutes 18 seconds	Customs + C&F agents
Port Procedure (entry of truck to export cargo village, weighting, and unloading)	1 hour 20 minutes 44 seconds	Civil Aviation Authority + Biman + C&F agents + Trucker
Customs Procedure at the export village (examination)	21 minutes 27 seconds	Customs + C&F agents
Procedure by Civil Aviation Authority and Airline Authorities	4 hours 39 minutes 39 seconds	Airline authorities + Biman + Civil Aviation Authority + C&F agents
Total time Arrival to final release of good	<ul style="list-style-type: none"> <li>• 47 hours 37 minutes 4 seconds (from submission of bill of export submission TO flight leaving)</li> <li>• 43 hours 45 minute 31 seconds (from a hard copy of file/folder submitted for export assessment TO flight leaving)</li> <li>• 6 hours 39 minutes 48 seconds (from the entry of truck to the export village TO flight leaving)</li> </ul>	Customs + Biman + Civil Aviation Authority + C&F agent + Trucker

Source: SANEM's calculation from the sample survey



## 6.2.2 Processing Time by the Counterpart Agencies

The average processing time to obtain clearance from the counterpart agencies at the Dhaka airport is presented in Table D-7. The processing time to obtain a clearance certificate is measured from the moment a sample is taken or sent to the inspecting officer of the counterpart agency or Custom House to the moment when a clearance certificate is received.

The offices of the PQW, DLS, and DoF are present in the import cargo village at the HSIA. The officer in those agencies is informed by the C&F agents about the consignments that require tests. The samples are collected by the Customs ARO for physical examination only for the OGAs that have office at HSIA premises (PQW, DLS, and DoF). To obtain certification from BAEC, BSTI, and BCSIR authorities, the sample is drawn by the Customs ARO and sent to the Dhaka Custom House for the issuance of a letter to the OGA, as they do not have office at the HSIA premises.

The sample contained bills of entry that required certification from PQW and DoF. The sample bills of entry also contained foodstuffs, however, those did not undergo any testing as they were imported through express courier as very small scale samples. To gather information for the clearance times of BCSIR, BSTI, and BAEC, the team reviewed files from November 2021 through January 8, 2022, and some from February 2022. However, information from these bills of entry was not used to calculate the average import clearance time for the purposes of this TRS, as those files were generated outside the survey timeline.



**Table D-7: Average time required to receive clearance from the counterpart agencies at the Dhaka airport**

Name of the Authority	Average time required to receive clearance	Number of samples	Remarks
PQW	52 minutes 3 seconds	55	Maximum 1 hour 40 minutes, minimum 25 minutes
DoF	n/a	9	Maximum 55 minutes, minimum 25 minutes
DLS	1-2 hours	No samples received	Kills with DLS quarantine officer at HSIA, and FGD with C&F agents <sup>1</sup>
BSTI	35 days (not an average estimate)	1	Only one bill of entry that required BSTI certification could be collected. This should not be considered an average. The lab test reports of this particular bill of entry are provided in Appendix (B2).  The sample was sent to BSTI on November 24, 2021, the test report was published on December 28, and received by Customs on December 30.
BAEC	Minimum 2 days, maximum 10 days	5	
BCSIR	Minimum 5 days, maximum 30 days	6	

*Source: SANEM's calculation from the sample survey*

# 7

## DETAILED TRS REPORT ON THE BENAPOLE LAND PORT







## Detailed TRS Report on the Benapole Land Port



### 7.1 Overview of the Benapole Land Port

Benapole is the largest land port and the second-largest Custom House in Bangladesh. Despite Covid-19 disruptions, the Benapole Custom House experienced revenue growth of around 30 percent in the initial seven months of FY 2021-22, reaching BDT 2436 crore<sup>40</sup>. Around 500 to 600 truckloads of goods are imported through the Benapole port each day. Agricultural commodities that pass through the port include fresh fruits and vegetables, frozen fish, beans and seeds, cereals, wheat, spices, some prepared foods, and agro-processed items.

#### 7.1.1 Customs Processing of the Agricultural Commodities at the Benapole Custom House

This section details the business process map for importing and exporting agricultural commodities through the Benapole port.

##### **IMPORTS**

For the purposes of this study, the import procedure starts from the moment when the border man from the Indian side of the border submits documents at the cargo branch of the Benapole Custom House and ends when the consignment is released by Customs after accomplishing all necessary regulatory compliances. If the agricultural commodity is perishable (fresh vegetables, fresh fruits, fish, etc.), the shipment undergoes a simplified procedure.

The business process map is presented in detail in Appendix (B5). The steps of the import process are summarized in Table B-1: Steps of border formalities and entry of the Indian truck at Benapole port. (Entry of the truck into the port) and Table B-2 (assessment, examination, and release of goods).

<sup>40</sup>Benapole Customs report growth in revenue despite pandemic | Online Version (daily-sun.com)

**Table B-1: Steps of border formalities and entry of the Indian truck at Benapole port**

Step 1	Indian Customs official comes to the cargo branch of Bangladesh Customs with necessary documents (car pass, manifest, shipping bill, etc.)
Step 2	Manifests and car pass endorsed by the official at the Cargo branch and returns three copies of the car pass to the Border man
Step 3	Indian Customs keeps one copy of the car pass, and the Indian driver is allowed to enter Bangladesh
Step 4	Indian truck enters Bangladesh through the entry point and a barcode is provided to the car pass for entry to Benapole port
Step 5	Customs register car pass data in software
Step 6	Manifest entry in ASYCUDA World by Customs
Step 7	Vehicle marked for weighing
Step 8	The truck moves to the Truck Terminal of India (TTI) where shed posting is provided. If the good is perishable, then the truck moves directly to Shed 31
Step 9	Unloading is done and the Indian truck leaves the warehouse (for a simplified process, unloading and loading happen simultaneously)

Source: SANEM's Assessment

**Table B-2: Steps of assessment, examination, and release of imported consignments at Benapole port**

Step 10	Collection of Manifest from the Cargo Branch by the C&F agent
Step 11	C&F agents manually submit the bills of entry to the DTI clerk
Step 12	Direct Traders Input (DTI) clerk enters data in ASYCUDA and provides hardcopy and file to the C&F agent
Step 13	C&F agents submit the file to the ARO (Assessment). ARO checks the file and supporting documents, signs, and returns to the C&F agent
Step 14	C&F agent submits the file to the RO. RO checks files and documents and marks files for examination, if necessary
Step 15	C&F agent submits the file to Assistant Commissioner/RO (Examination), if necessary
Step 16	AC/RO (Examination) refers to an ARO for examination
Step 17	ARO collects samples for examination. OGA examination can happen either simultaneously or sequentially
Step 18	AC/RO (Examination) approves the examination and refers the file to RO (Assessment)
Step 19	C&F agent submits the file to the ARO (Assessment). ARO (Assessment) documents his observation and refers the file to RO for approval
Step 20	RO approves assessment, enters data to ASYCUDA, and prints assessment notice
Step 21	C&F agent pays duty at the Bank (online or manual)
Step 22	C&F agent submits paid assessment notice and releases order to the Deputy Traffic Manager (DTM) building
Step 23	C&F agent pays port dues and receives loading order and gate pass
Step 24	C&F agents submit the gate pass and loading order to the shed in charge, load the truck, and exit the shed
Step 25	Document verification at the joint check post of Customs and BGB for the final release of the goods-laden truck

Source: SANEM's Assessment



# EXPORTS

As discussed in the key findings, the export business process is simpler than the import process. The GoB’s mandate to facilitate exports is an important driver for an expedited clearance process for exports. The specific steps of the export clearance process for agricultural commodities are presented in a diagram in Appendix (B6). The summary of the steps of the export process is detailed in Table B-3.

**Table B-3: Steps of assessment, examination, and release of export consignments at the Benapole port**

Step 1	C&F agent submits Bill of Export (manually) to the DTI clerk
Step 2	DTI clerk enters Bill of Export data in ASYCUDA and provides hard copy and file to the C&F agent
Step 3	C&F agent submits the file to the ARO for assessment
Step 4	ARO completes the assessment, endorses the Bill of Export, and returns the file to the C&F agent
Step 5	C&F agent submits the file to the RO
Step 6	RO approves assessment, prints assessment notice, and returns file to the C&F agent
Step 7	C&F agent pays necessary fees (port charges) at the Bank
Step 8	Customs enter data to ASYCUDA, and the release order is printed
Step 9	Consignment arrives at the export yard for physical examination
Step 10	C&F agent submits the file to the RO at the examination location, and RO assigns an ARO for examination
Step 11	Examination ends, and the file is returned to the C&F agent
Step 12	C&F agent submits the file to the AC/RO for the approval
Step 13	C&F agent registers for car pass and car pass is issued
Step 14	C&F agent submits car to pass at the exit point
Step 15	Gate pass issued and truck exits Bangladesh
Step 16	Export information is updated in the Export General Manifest (EGM) register by the C&F

Source: SANEM’s Assessment



## 7.2 Findings from Benapole Land Port

### 7.2.1 Processing Time by Phase

This section describes the time taken to complete each step of the clearance process for both imports and exports. Imports are discussed first. Of the 223 bills of entry submitted during the survey period (between December 28, 2021, and January 9, 2022) for food and agricultural imports covered under HS Chapters 1-24, 68 bills of entry were collected by the enumerators. Out of these, 55 bills of entry included complete information and were verified with the data of ASYCUDA World. Four certifications were also reviewed which were from outside of the survey period. These 59 samples were utilized to calculate the average time duration. This sample consisted of fresh fruits and vegetables, and fish. The majority of the samples (52) were processed through a simplified procedure, where the truck directly arrives at the storage shed (shed no. 31). The team was not able to identify records for the products that require certification by BSTI or BCSIR, therefore these bills of entry were not included in the analysis.

The average time required to complete the import clearance process starting from the presentation of documents at the border to the final release of the goods is 8 hours 14 minutes for the bills of entry that are subject to the simplified procedure (mostly perishable items). The timing for the bills of entry that were subjected to non-simplified procedure (the remaining 3 out of 55) was maximum 178 hours 10 minutes (7 days), minimum 172 hours 48 minutes (7 days).

Similarly, the average time required to complete the import clearance process starting from the time when the truck enters the Bangladeshi border to the release of the goods is 6 hours 14 minutes, for the bills of entry under the simplified procedure. For non-simplified procedures, the time is maximum 177 hours 35 minutes, minimum 171 hours 58 minutes. The average time at each point of the import clearance process is listed in Table B-4.



**Table B-4: Average, minimum, and maximum time required for completing individual steps of import clearance process at the Benapole port**

Interval	Avg Time	Min Time	Max Time	Comments
<b>1. Cargo Branch &amp; Entry Point</b>				
1.1. Border man presents documents at cargo branch TO Cargo branch assigns manifest number; sign copies of Car Pass and returns to border man	15 minutes 43 seconds	5 minutes	25 minutes	55 samples
1.2. Truck entry to Bangladesh border TO Customs officer enter Car pass data to BCOM software and manifest data to ASYCUDA	19 minutes 44 seconds	5 minutes	40 minutes	55 samples
1.3. (If manifest marked for weighing) The loaded truck arrived at the Customs weighing scale TO truck leaves weighing scale with weighing slip	5 minutes 7 seconds	3 minutes	10 minutes	11 samples
1.4. If manifest rejected for correction: manifest returned to agents for correction TO approved manifest returned to cargo branch				No samples identified
1. A. Total time required in cargo branch and entry point, if truck not marked for weighing	2 hours and 21 minutes 9 seconds	55 minutes	4 hours 20 minutes	44 samples
1. B. Total time required in cargo branch and entry point if the manifest mark for weighing	2 hours 27 minutes 55 seconds	1 hour 25 minutes	6hour 10 minute	11 samples
1.C. Gap time, border person collects endorsed manifest and car pass TO Truck enters Bangladesh border	1 hour 26 minutes 51 seconds	20 minutes	3 hours 50 minutes	55 samples
<b>2. Simplified Procedure for Perishable Items</b>				
2.1. Truck Arrived at Shed 31 TO Weighting commences and ends	11 minute 38 second	5 minutes	30 minutes	52 samples
2.2. Indian truck unloading commences TO unloading ends	1 hour and 51 minutes 15 seconds	40 minutes	3 hour and 15 minutes	52 samples
2.3. Loading of goods to Bangladeshi truck commences TO loading ends	1 hour and 47 minutes 24 seconds	35 minutes	3 hours	52 samples
2.A. Total time required from coming to shade 31 to loading of goods to Bangladeshi truck	2 hour and 41 minutes 21 seconds	1 hour and 40 minutes	7 hours	52 samples
<b>3. TTI procedure and shed posting</b>				
3.1. Truck Arrived at the TTI TO Weighting commences and ends	9 minutes 20 seconds	5 minutes	15 minutes	3 samples
3.2. Arrival of the truck at the shed posting office TO leaving of the truck from the shed posting office after being posted to the designated shed	11 minutes 40 seconds	5 minutes	15 minutes	3 samples

3.3. Arrival of the truck at the shed TO the end of unloading of the truck	1 hour 5 minutes	55 minutes	1 hour 10 minutes	3 samples
<b>4. Submission of Bills of Entry and preparation of folder from DTI</b>				
4.1. C&F agent submits a hard copy of bills of entry and supporting documents to the DTI clerk TO DTI clerk enters information to ASYCUDA and returns hardcopy of file/folder to the C&F agent	21 minutes 11 seconds	5 minutes	1 hour 10 minutes	55 samples
<b>5. Assessment (phase 1)</b>				
5.1. C&F agent submits Bills of entry to ARO TO ARO signs and returns file to C&F agent	10 minutes 33 seconds	Less than a minute	30 minutes	55 samples
5.2. C&F agents submit Bills of Entry and other documents to Revenue Officer (RO) TO RO marks file for examination and return the file to the C&F agent	7 minutes 12 seconds	Less than a minute	23 minutes	55 samples
5.A. Total time required in the Assessment Phase 1	25 minutes 11 seconds	3 minutes	1 hour 10 minutes	55 samples
<b>6. Examination</b>				
6.1. C&F agent submits the file to the RO/AC (Examination) TO referral of the file to an ARO	11 minutes 17 seconds	Less than a minute	20 minutes	55 samples
6.2. C&F agents submit the file to the designated ARO at the shed TO sample is drawn and the examination ends	1 hour and 1 minute 46 seconds	10 minutes	3 hours	55 samples
6.3. A. If OGA is required, the Total time from sample collection TO receipt of the certificate (simplified procedure)	50 minutes 12 seconds	10 minutes	3 hours	52 samples PQW and DoF
6.3. B. If OGA is required, the Total time from sample collection TO receipt of the certificate (non-simplified procedure) in days	3 days	2 days	5 days	Samples only have DLS certification
6.4. If examination result is not in accordance with the declaration: Time of commencing of re-examination TO re-examination ends and file handed over to the C&F agent				No sample found
6.5. Total time for examination by Customs only	1 hour and 25 minutes 34 seconds	20 minutes	3 hour and 30 minutes	55 samples
<b>7. Assessment (Phase 2)</b>				
7.1. C&F agent submits the file to ARO (Assessment) TO ARO verifies examination documents and transfers file to RO (Assessment)	8 minutes 23 seconds	Less than a minute	20 minutes	55 samples
7.2. If penalty applicable, the total time required to make decisions regarding penalty				No sample found
7.3. If amendment required in Bills of Entry, Time of Bills of Entry commences TO Time Bills of Entry amendment ends	5 minutes 29 seconds	2 minutes	15 minutes	43 samples
7.4. RO approves assessment TO data entered to ASYCUDA, and assessment notice printed and handed over to the C&F agent	11 minutes 42 second	1 minute	50 minutes	55 samples
7.A. Total time required for the Assessment Phase 2	28 minutes 27 seconds	8 minutes	1 hour and 15 minutes	55 samples

<b>8. Duty Payment</b>				
8.1. C&F agent commences duty payment at the bank TO release order is printed	17 minutes 43 seconds	4 minutes	1 hour	55 samples
8.A. Total time between receiving assessment notice from RO to completion of duty payment and receiving of release order (simplified procedure)	34 minutes 25 seconds	10 minutes	2 hours 57 minutes	55 samples
8.B. Total time between receiving assessment notice from RO to completion of duty payment and receiving of release order (non-simplified procedure)	13 hours 28 minutes 20 seconds	2 hours 5 minutes	19 hours 15 minutes	3 samples
8.C. Gap time between printing of assessment notice TO completion of banking procedure (simplified procedure)	20 minutes 39 seconds	1 minute	2 hours 45 minutes	52 samples
8.D. Gap time between printing of assessment notice TO commencement of banking procedure (non-simplified procedure)	12 hours 41 minutes 40 seconds	1 hour 15 minutes	18 hours 30 minutes	3 samples
<b>9. Port Authority Release</b>				
9.1. C&F agents submit assessment notice and release order to DTM-TO-DTM office calculates port charges	31 minutes 10 seconds	3 minutes	2 hours 20 minutes	55 samples
9.2. C&F agents pay port charges commences TO C&F agent pays port charges ends	10 minutes 46 seconds	2 minutes	1 hour	55 samples
9.3 Truck loading commences TO Truck loading ends	1 hour and 24 minutes 25 second	40 minutes	3 hours	55 samples
9.A. Total time required for port authority release	1 hour 36 minute 34 second	15 minutes	4 hours 20 minute	55 samples
10. Verification at the BGB and Customs joint check post				
10.1. C&F agents submit the file at the check post TO approval of release by Customs and BGB after verification	19 minutes 36 seconds	2 minutes	1 hour	55 samples
10.A. Total time required in Joint check post	23 minutes 46 seconds	3 minutes	1 hour 5 minutes	55 samples
<b>Overall</b>				
A. Total time required to clear goods starting from the submission of documents by the border man TO final release of truck (simplified procedure)	8 hours 12 minutes 55 seconds	5 hours	12 hours 10 minutes	52 samples
B. Total time required to clear goods starting from the submission of documents by the border man TO final release of truck (non-simplified procedure) (in days)	Maximum 178 hours 10 minutes, minimum 172 hours 48 minutes			3 samples
C. Total time required to clear goods starting from the submission of documents by the border man TO final release of truck (if PQW certification required)	8 hours 56 minutes 32 seconds	6 hours 33 minutes	12 hours 10 minutes	31 samples
D. Total time required to clear goods starting from the submission of documents by the border man TO final release of truck (if DoF certification required)	7 hours 2 minutes 11 seconds	5 hours	11 hours 50 minutes	21 samples

E. Total time required to clear goods starting from the submission of documents by the border man TO final release of truck (if DLS certification required)	Maximum 178 hours 10 minutes, minimum 172 hours 48 minutes			3 samples
F. Total time required to clear goods starting from the entry of truck to Bangladesh border TO final release of truck (simplified procedure)	6 hours 14 minutes 5 seconds	3 hours	9 hours 20 minutes	52 samples
G. Total time required to clear goods starting from the entry of truck to Bangladesh border TO final release of truck (non-simplified procedure) (in days)	Maximum 177 hours 35 minutes, minimum 171 hours 58 minutes			3 samples

Source: SANEM's calculation from the sample survey

Adding the time required in each step of the import procedure will not add up to the overall time because it does not reflect the buffer, i.e., the time between finishing one task and starting the next one. For example, when a bill of entry is marked for examination, the C&F agent may take some time to start the next examination process. This could be due to distance of the examination location, personal priorities, and many other factors. This obviously increases the overall clearance time. In this case, in section 2 (simplified procedures for perishable items), the unloading of the Indian truck and the loading of the Bangladeshi truck occurs simultaneously for goods subject to simplified procedures.





In Table B-5, agency-specific timing is provided. The timing presented in the table is the cumulative average time of each step of that particular phase and procedure. The following calculations are exclusive of buffer timing.

**Table B-5: Agency-wise clearance time for import clearance procedure at the Benapole port**

Import Procedure	Cumulative average time of each step of the phase and procedure	Responsible agency/entity
Procedure at the entry point and cargo branch of Customs	40 minutes 34 seconds	Port Authority + Customs + C&F agents + trucker
Procedure at Shed 31 (perishable items)	2 hours 1 minute 38 seconds	Port Authority + trucker
Procedure at the Truck Terminal of India (TTI)	1 hour 26 minutes	Port Authority + trucker
Customs Procedures (before examination)	38 minutes 56 seconds	Customs + C&F agents
Customs Procedure (during examination)	1 hour 13 minutes 3 seconds	Customs + C&F agents
OGA Procedure	<ul style="list-style-type: none"> <li>• 50 minutes 12 seconds (for the simplified procedure where certification of PQW and DoF were necessary, 55 samples)</li> <li>• Maximum 5 days and minimum 2 days (non-simplified procedure where DLS certification was required for poultry feed)</li> <li>• 14 days for BSTI (only one sample from an old file could be collected)</li> <li>• Maximum 83 days and minimum 15 days for BCSIR certification (3 samples from older files)</li> </ul>	OGAs (PQW, DLS, DoF, BSTI, BAEC, and BCSIR)
Customs procedure after examination	25 minutes 34 seconds	Customs + C&F agents
Banking procedure	17 minutes 43 seconds	Bank + Customs + C&F agents
Port authority clearance procedure (post Customs)	1 hour 36 minutes 24 seconds	Port Authority + Trucker+ C&F agents
Joint check post of BGB and Customs	43 minutes 21 seconds	BGB + Customs
Total time Arrival to final release of good	<ul style="list-style-type: none"> <li>•8 hours 14 minutes 5 second (for simplified procedure, 52 samples)</li> <li>•7 days (for non-simplified procedure, 3 samples, poultry feed)</li> </ul>	Customs + Port Authority + C&F agent + Trucker + Bank +BGB

Source: SANEM's calculation from the sample survey

During the survey timeline, only 34 bills of export were processed for products in HS chapters 1-24. The bills of export that were collected mainly included fish (other than Hilsa) and one for cashew nuts. The enumerators were only able to gather information that matched the ASYCUDA data from 15 bills of export (44 percent of the total), and these were the bills utilized for the analysis.

Based on the sample of 15, the average time to complete the export clearance process from submission of the bill of export to the exit of the truck from the Bangladeshi border is **5 days (maximum 13 days, minimum 1 day)**. This variability is due to the bills of export being submitted online days earlier than the arrival of the truck at the export yard. Once the truck enters the export yard, the average release time decrease sharply to **50 minutes**. The gap time between submission of the bill of export and the initiation of the assessment process is **34 hours 26 minutes** on average. The difference in time between the assessment notice being printed and the initiation of the payment procedure is **39 hours 7 minutes on average**.

The authorities at the Benapole Custom House indicated that there are many reasons that trucks may arrive later than expected, including traffic congestion outside the Benapole border crossing, failure to adequately pack and manage items to clear in an expedited manner, and lack of available trucks. The average time required in each segment of the export clearance process was more or less similar in all the completed questionnaires. The detailed timing for each segment is presented in Table B-6.

**Table B-6: Average, minimum, and maximum time required for completing individual steps of export clearance process at the Benapole port**

Interval	Avg Time	Min Time	Max Time	Comments
<b>1. Submission of Bills of Export and preparation of folder from DTI</b>				
1.1 C&F agent submits hardcopy of bills of export to DTI clerk TO DTI clerk inputs data in ASYCUDA and prepares hardcopy of file and returns to C&F agent	13 minutes 52 seconds	10 minutes	30 minutes	15 samples
<b>2. Assessment</b>				
2.1.C&F agent submits the file to the ARO (Assessment) TO ARO completes the assessment and hands the file to the C&F agent	9 minutes 8 seconds	2 minutes	20 minutes	15 samples
2.2. C&F submits the file to RO (Assessment)TO RO finishes the assessment, prints the assessment notice, and returns the file and assessment notice to C&F agents	7 minutes 28 seconds	1 minute	26 minutes	15 samples
<b>3. Payment of port dues and other necessary fees</b>				
3.1. C&F agent submits documents at the Bank-TO-Bank procedure ends	11 minutes 56 seconds	4 minutes	30 minutes	15 samples
4.2 C&F agent enters information in the car pass register TO issuance of car pass	21minutes 52 seconds	10 minutes	38minutes	15 samples

4.3 Physical Examination commences TO examination ends	12 minutes 40 seconds	10 minutes	20 minutes	15 samples
4.4 Examination ends TO file returned to the C&Fagent	2 minutes 36 seconds	Less than a minute	5 minutes	15 samples
4. A. Total time required in the examination	32 minutes 32 seconds	15 minutes	55 minutes	15 samples
<b>5. Release and Export</b>				
5.1.C&F agent submits car to pass at the exit point of Bangladesh TO gate pass issued and truck leaves Bangladesh	11 minutes	05 minutes	25 minutes	15 samples
5.2. C&F agent enters information to the EGM register commences TO entering information to EGM registering ends	46 minutes	25 minutes	60 minutes	15 samples
<b>Overall</b>				
A. Total time to complete the export clearing process starting from bills of export submission TO exit of the truck from the Bangladesh border	5 days	1 day	13 days	Bills of export can be submitted earlier than the time truck comes to the export yard
B. Total time to complete the export clearing process starting from the truck entering the export yard to the truck leaving Bangladesh	50 minutes	30 minutes	1 hour 30 minutes	15 samples
C. Gap time between submission of Bills of export online to start of the assessment procedure	34 hours 26 minutes	7 minutes	169 hours	15 samples
D. Gap time between completion of assessment phase TO starting of the fees payment procedure (in days)	39 hours 7 minutes 52 seconds	14 minutes	119 hours 2 minutes	15 samples

Source: SANEM's calculation from the sample survey

As explained earlier, adding the time required in each step of the import procedure will not add up to the overall time because it does not reflect the buffers encountered throughout the process.

In Table B-7, agency-specific times are provided for the export clearance process. The timing presented is cumulative of the average time of each step of that particular export phase and procedure. The following calculation is exclusive of buffer timing.

**Table B-7: Agency-specific clearance time for export clearance procedure**

Export procedure	Cumulative average time of each step of the phase and procedure	Responsible agency/entities
Customs procedures	30 minutes 28 seconds	Customs + C&F agents
Banking procedures	30 minutes 40 seconds	Bank + Customs + C&F agents
Examination	39 minutes 32 seconds	Port Authority + Customs + C&F agents
Issuance of gate pass and release of the truck	11 minutes	C&F agent + Port Authority
EGM submission	46 minutes	C&F agent + Port Authority + Customs
Total time to complete the export clearing process starting from bills of export submission TO exit of the truck from the Bangladesh border	5 days	C&F agent + Port Authority + Customs + Trucker + Bank
Total time to complete the export clearing process starting from bills of export submission TO exit of the truck from the Bangladesh border	50 minutes	C&F agent + Port Authority + Customs + Trucker + Bank

Source: SANEM's calculation from the sample survey

## 7.2.2 Processing Time by the Counterpart Agencies

The average processing time to receive clearance from the counterpart agencies at the Benapole port is presented in Table B-8: Average time required to receive clearance from the counterpart agencies at the Benapole port. The timing for receiving the clearance certificate is measured from the time the sample is taken or sent by the inspecting officer of the counterpart agencies to the time when a clearance certificate is issued. PQW and DoF have offices and examiners near the Benapole port area. BSTI and DLS conduct tests in Khulna, while BCSIR's certification samples are sent to the Dhaka lab.

**Table B-8: Average time required to receive clearance from the counterpart agencies at the Benapole port**

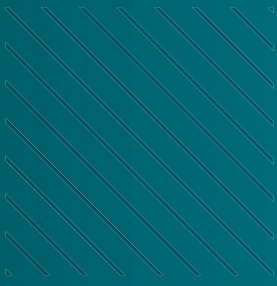
Name of the Authority	Average time required to receive clearance	Number of samples	Remarks
PQW	1 hour	31	Minimum 30 minutes, maximum 3 hours
DoF	35 minutes 43 seconds	21	Minimum 10 minutes, maximum 1 hour 10 minutes
DLS	Maximum 5 days, minimum 2 days	3	Imports of animals and animal products are relatively rare in Benapole. Imports of animal feed are tested by DLS. We report the maximum and minimum clearance times, and not an average, due to the small sample size.
BSTI	Maximum 14 days, minimum 14 days	1	This information is based on one sample and KILs with Benapole officials (Customs and C&F leaders).
BAEC	No information	No samples identified	As per the IPO, the products coming through Benapole port are mainly from India, therefore no radiation tests are necessary. Benapole Customs accepts radiation certificates issued from Indian labs. <sup>41</sup>
BCSIR	Minimum 15 days, maximum 83 days	3	This is based on 3 samples and KILs with Customs officials and C&F leaders and should not be interpreted as an average.

Source: SANEM's calculation from the sample survey

<sup>41</sup> IPO 2015-18, rule 16, sub-rule (16).

# 8

## RECOMMENDATIONS



# Recommendations

Based on the findings from the survey, and the qualitative data gathered through KIIs and FGDs, the following recommendations are provided to streamline the clearance process for agricultural and perishable products through the three major ports of Bangladesh. Table R-1 to R-4 provides a recommendation matrix, along with the proposed implementing body and the timeline for implementation.

## CHATTOGRAM SEAPORT

**Table R-1: Proposed recommendations, implementing body, and timeline for Chattogram Seaport**

Issues	Recommendation	Implementing body	Timeline
<b>Chattogram Seaport</b>			
<b>Redundant steps</b>			
The function and existence of the “Outpass” section for import clearance should be reconsidered. Eliminating this process can reduce clearance times	The activity in the “Outpass” section after the assessment notice is printed takes on average 16 minutes (approximately) with a maximum of 1 hour 40 minutes. Chattogram Custom House should reconsider whether this is necessary.	Chattogram Custom House	6-12 months (short term target)
Scanning of containers that are physically examined	Sometimes containers that underwent physical inspections were also scanned. This increases the average clearance time of the port authority. This is a redundant step and impedes the overall clearance process.	Chattogram Custom House and CPA	6-12 months (short term target)
<b>Port Procedure</b>			
Issues	Recommendation	Implementing body	Timeline
Identification of container location	To identify the container location, the C&F agent needs to contact the port authority. An integration of ASYCUDA World with the central server of CPA can eliminate this process if the container information and location are available earlier during the assessment phase.	Ministry of Shipping, NBR, CCH, and CPA	2-3 years (mid-term target)
Appointment of examination officer by the AC	C&F agent must know the name of the examination officer from AC. If a system-generated auto-assignment process is introduced, which will assign the corresponding examination officer and time of the examination, then these steps can be eliminated.	NBR, CPA	2-3 years (mid-term target)

Providing indent by the C&F agent for container keep down	If a system-generated auto-assignment process is introduced, which will assign the corresponding examination officer and the time of the examination, then the port authority will also be aware of the examination time and manage the keep down of containers accordingly. This step can be eliminated.	NBR, CPA	2-3 years (mid-term target)
Increasing the number and functionality of the off-docks	More off-dock and depot facilities will reduce pressure and strengthen trade facilitation at Chattogram port. Dedicated off docks for agro-product can be thought of so manpower can be allocated accordingly.	NBR	2-5 years and more (mid-term to long term target)
DLS lab at Chattogram	As there is no dedicated testing lab of DLS in Chattogram, the imported animal and animal products are tested at the Poultry Research and Training Lab (PRTC Lab) of Chattogram Veterinary and Animal Sciences University which remains closed during Fridays and Saturdays. This causes delay in the product clearance. Coordination between OGAs can be established so products can be tested at other agency labs having similar i.e. DoF to avoid the challenge. The fee payment and test report issuance process should be made online.	DLS	2-5 years and more (mid-term to long term target)
BSTI office near port	There is currently no BSTI office located close to the Chattogram port after the D-shed demolition. Therefore, it is recommended to set up a BSTI office close to the port area so that BSTI officers may regularly collect samples. Additionally, the BSTI is recommended to increase their manpower and working days as well as the inclusion of a risk management provision in their act.	BSTI	2-5 years and more (mid-term to long term target)





## DHAKA AIRPORT

**Table R-2: Proposed recommendations, implementing body, and timeline for Dhaka Airport**

Dhaka airport			
Redundant steps			
Issues	Recommendation	Implementing body	Timeline
Referral mechanism ROs, AROs, ACs/DCs	The referral mechanism of RO to ARO and back to RO for the examination process at the export cargo village needs to be redesigned. If the corresponding examination officer (ARO) is assigned by the ASYCUDA World/RO (assessment) then the C&F agent can submit files for examination directly to the designated ARO. Referral of file to group AC/DC during the import clearance process should also be rethought and minimized as necessary.	Dhaka Custom House	6-12 months (short term target)
Bank receipt submitted to ARO for release order printing	Submission of bank receipts to ARO for printing release orders can be eliminated, as Biman Bangladesh Airlines can already verify payment information online.	NBR, Biman Bangladesh Airlines, Dhaka Custom House	6-12 months (short term target)

Development of the Export/Import Cargo village at Dhaka Airport			
Issues	Recommendation	Implementing body	Timeline
Inadequate space in import village	The storage space in the import village is inadequate; especially the cold storage facilities. Perishable commodities are often left on the runway due to inadequate space in the import cargo village and lacking cold storage. NBR, DCH, Civil Aviation Authority, Biman Bangladesh Airlines, and other donors should work together to establish adequate space in the import village and also ensure a better cold storage infrastructure for perishable/agricultural commodities.	NBR, DCH, CAAB, Biman Bangladesh	2-3 years (mid-term target)

Inadequate space in export cargo village	The space in the export cargo village is inadequate. The export cargo village shed area is often filled to capacity, which delays the entry of trucks to the export village as unloading cannot be done.  Civil Aviation Authority of Bangladesh (CAAB) has already taken the initiative to make a separate space for agriculture and perishable items at the export cargo village, which needs to be completed urgently to avoid further delays.	NBR, DCH, CAAB, Biman Bangladesh Airlines, and Donor agencies Bangladesh	6-12 months (short-term target)
Solving technical problems of scanner machines at the export cargo village	Some scanners in export cargo villages are often not functioning. Technicians of these scanners are called from abroad for repair, which often takes months. This is a significant cause of delay in export processing. Local technicians and private investors should be engaged to solve such technical failures.	CAAB, Private investors, BUET, and other technical institutes	2-3 years (mid-term target)

## BENAPOLE LAND PORT

**Table R-3: Proposed recommendations, implementing body, and timeline for Benapole Land Port**

Benapole Land Port			
Redundant Steps			
Issues	Recommendation	Implementing body	Timeline
Referral mechanism of ROs, AROs, ACs/DCs	The referral mechanism of RO to ARO and back to RO for the examination process at the export cargo village needs to be redesigned. If the corresponding examination officer (ARO) is assigned by the ASYCUDA World/RO (assessment) then the C&F agent can submit files for examination directly to the designated ARO.  Referral of file to group AC/DC during the import clearance process should also be rethought and minimized as necessary.	Dhaka Custom House	6-12 months (short term target)

<b>Development of Port infrastructure</b>			
<b>Issues</b>	<b>Recommendation</b>	<b>Implementing body</b>	<b>Timeline</b>
Development of port infrastructure (shed areas and corresponding roads)	Benapole Land Port Authority needs to improve and increase its shed areas and corresponding roads so that the port can efficiently manage a significant volume of trucks efficiently.	BLPA, Ministry of Shipping	2-3 years (mid-term target)
Establishment of a computer-based joint truck entry system	GoB should consider introducing a computer-based joint (India-Bangladesh) truck entry system to reduce the time and procedures required for the entry of trucks. If a computer-based joint truck entry system is implemented, then the EGM on the Indian side can be considered as the IGM at the Benapole port. This will reduce the time for manifest submission and entry. In addition, the shed posting of trucks would be less time-consuming and more efficient in the presence of the joint truck entry system.	MoC, MoFA, Ministry of Shipping, NBR, Benapole Custom House, BLPA	2-3 years (mid-term target)
<b>Other</b>			
Testing facilities near Port	<p>One of the major reasons behind the delay in clearance process was found to be high time taken for issuing test report. BCSIR does not have any establishment near Benapole, not even in Khulna. The samples are sent to Dhaka and the lab tests a large number of parameters before issuing certificate which takes a lot of time. Instances show that by the time quality certificate is issued, a number of products have lost their quality to be sold in the market. In addition, the fees charged by the BCSIR is also huge.</p> <p>On the other hand, the number of products which require mandatory testing from BSTI has increased in the IPO 2021-24. Many of the products are sent to Dhaka as the Khulna lab does not have the capacity which increases the time for issuing test results. At Benapole, a remarkable number of the products that are being delayed in getting clearance and are creating congestion at port are awaiting certification from the BSTI's end. The capacity issue of BSTI needs to be addressed. In addition, automated system for test report transfer process can reduce the time by at least one day as sending hard copy of reports take an additional day for clearance.</p> <p>computer-based joint truck entry system is implemented, then the EGM on the Indian side can be considered as the IGM at the Benapole port. This will reduce the time for manifest submission and entry. In addition, the shed posting of trucks would be less time-consuming and more efficient in the presence of the joint truck entry system.</p>	BSTI, BCSIR and concerned regulatory agencies	2-5 years and more (mid-term to long term target)

Establishment of offices of regulatory authorities near port area	The certifying of regulatory authorities must have offices near the port vicinity to make the release and clearance process efficient.	NBR, concerned regulatory agencies	2-5 years and more (mid-term to long term target)
Allocation of human resources at DLS	The DLS lab has testing capacity for animal feed but not being able to conduct due to lack of manpower. The manpower at the office needs to be increased.	DLS	Short-term target
Omitting the requirement of formalin test for chilled fish	Chilled fish imported through the Benapole land port is required to be tested for heavy metal though it is unlikely to get heavy metal in chilled fish. Moreover, testing for heavy metal requires at least 7 days causing delay in product release and deteriorating the quality of the products. The requirement can be omitted. However, this is not being practiced and exporting country certificate is being accepted.	DoF	2-5 years and more (mid-term to long term target)

## Overarching Recommendations

**Table R-4: Overarching recommendations, implementing body, and timeline**

Physical Examination			
Issues	Recommendation	Implementing body	Timeline
Elimination or gradual reduction of 100% physical inspection of agricultural commodities	100% examination impedes the overall import clearance process. This needs to be replaced by system-generated random risk management provisions against the import declarations, based on WCO best practices.	NBR, concerned regulatory agencies	2-3 years (mid-term target)
Strengthen risk management and AEO system	Green, yellow, red, and blue line-based assessment systems of ASYCUDA World need to be fully implemented to reduce the time required for clearance. Introduction of trusted trader program and Authorized Economic Operator (AEO) programs can help implement the green and yellow channel-based clearance process, and thus reduce clearance times drastically. Bangladesh's AEO program has only three entities now. Increasing this number and strengthening AEO initiatives targeted at agricultural commodities will ensure faster clearance times.	NBR, concerned regulatory	2-3 years (mid-term target)

OGA Clearance			
Issues	Recommendation	Implementing body	Timeline
EMore integration of OGAs with ASYCUDA World	The clearance process of other government agencies should be automated and integrated with the assessment (ASYCUDA World) system of Customs.	NBR	2-5 years (mid-term or long-term target)
Establishing a pre-arrival notification system for DLS	As per the DLS legislations, importers are required to share information of import with the DLS seven-days prior to goods arrival, which at present is not being followed causing delays in the agency's preparation related to quarantine and inspection. An automated pre-arrival notification system based on submission of bills of entry by the C&F agents may be introduced so DLS may take necessary preparation accordingly. Similar system can be established for other OGAs as well for their improved connectivity and information on import which would also contribute to risk management.	DLS, NBR, and other OGAs	Short-term target
Issuing Special Release Order (SRO from Plant Quarantine Stations	Special Release Order (SRO), in case of any error in IP, of PQW is being issued from Dhaka only, which delays the process. Provisions should be developed to issue from all the Plant Quarantine Stations.	PQW	6-12 months
Rethinking formalin and radiation tests for perishable commodities and food items	Required formalin and radiation tests for perishable commodities and foodstuffs increase the clearance time. High levels of formalin and radiation are very seldom found in consignments containing perishable commodities and foodstuffs . The IPO should reconsider mandatory testing requirements. A random, risk-based approach to such testing would reduce the average clearance time without jeopardizing safety.	MoC, NBR	2-5 years (mid-term or long-term)
Development of list of Government approved laboratories eligible for testing imported food products	The IPO 2021-24 has enabled scopes for including Government approved laboratories other than BSTI and BCSIR to be included in the process of testing of imported food products. However, the provision is not being implemented as there are not set guideline or list of such laboratories. The Ministry of Commerce need to issue the list of laboratories outlining the capacity requirements so the Customs can send samples to those laboratories which would contribute to reduction in clearance time.	MoC	6-12 months (short-term)
BCSIR's testing parameters	BCSIR is expected to test whether samples are suitable for human consumption, which could apply to over 200 chemical elements. If requests were developed for specific elements, (i.e., chromium, lead, potassium, sulfur, etc.) then it would expedite the testing process. BCSIR should formulate a set of parameters that they will test to declare any item suitable for human consumption, upon consultation with NBR, and Custom Houses in general.	BCSIR and NBR	6-12 months (short term target)

<p>Implementation of Revised Kyoto Convention (RKC)</p>	<p>Best practices of the RKC, including direct release, prior release, and simplified declarations, need to be introduced to reduce the average clearance time of agricultural commodities. This may include updating the Customs Act, 1969 to align with Bangladesh's commitments under the WTO Trade Facilitation Agreement.</p> <p>For products that require additional time to secure clearances from BSTI or BCSIR, the IPO should be updated with provisions to allow the importer to release the consignment upon signing a bond that s/he must store the products in her/his warehouse and can sell only when the clearance of the certifying authorities is received. If any deviation from the declaration or any harmful substance occurs, Customs may penalize the importer/C&amp;F agent and destroy the items.</p>	<p>MoC, NBR, and the Custom Houses</p>	<p>5 years and more (long term target)</p>
<p>Mutual Recognition Agreements (MRAs) between domestic and foreign testing authorities</p>	<p>Mutual recognition agreements (MRAs) between the testing agencies of Bangladesh and other countries represent a modern approach to reducing clearance times for agricultural products for both imports and exports. This will reduce the pressure on domestic testing authorities. These MRAs will allow the Customs authority of the importing country to clear the goods faster without needing to send samples to the local testing labs. The process can start with SAFTA or BIMSTEC member countries and progress gradually.</p>	<p>MoC, NBR, Ministry of Industry, EPB, DAE, BSTI, BCSIR, DoF, DLS, BAEC</p>	<p>2-5 years (mid-term or long-term)</p>
<p>Rethinking formalin and radiation tests for perishable commodities and food items</p>	<p>Required formalin and radiation tests for perishable commodities and foodstuffs increase the clearance time. High levels of formalin and radiation are very seldom found in consignments containing perishable commodities and foodstuffs. The IPO should reconsider mandatory testing requirements. A random, risk-based approach to such testing would reduce the average clearance time without jeopardizing safety.</p>	<p>MoC, NBR</p>	<p>2-5 years (mid-term or long-term target)</p>
<p>Establishing a combined testing infrastructure for all certification agencies near the port vicinity</p>	<p>If all the testing agencies can function under the same roof, then the time required to test samples will be reduced. NBR, Custom Houses, and port authorities should coordinate and work together to allocate land/space so that all testing authorities can have their testing labs under the same roof or at least in the port vicinity.</p>	<p>NBR, Custom Houses, port authorities, and the certification agencies</p>	<p>2-5 years (mid-term or long-term target)</p>
<p>Capacity building of the testing agencies</p>	<p>Certification agencies often lack adequate manpower and testing equipment. Increasing the capacity and manpower of these testing agencies will help reduce the overall clearance time of agricultural and perishable commodities.</p>	<p>Ministry of Industry, Ministry of Livestock and Fisheries, DAE, BSTI, BAEC</p>	<p>2-5 years (mid-term or long-term target)</p>
<p>Strengthening the coordination between and among the cross-border trade agencies for utilizing existing resources, especially laboratory capacity</p>	<p>Inter-agency collaboration to utilize the capacity of laboratories of one agency by other agencies will help making the clearance process efficient. A coordination mechanism can be established between the agencies in this regard.</p>	<p>MoC, NBR, Concerned Agencies</p>	<p>2-5 years (mid-term or long-term target)</p>

<b>ICT Infrastructure and Automation</b>			
<b>Issues</b>	<b>Recommendation</b>	<b>Implementing body</b>	<b>Timeline</b>
Disruptions in ASYCUDA World server	Disruptions in the ASYCUDA World server is a major cause of delays in the assessment and other clearance processes. This is a common response from the C&F agents in all three ports. The Custom Houses should target development of the overall IT infrastructure in consultation with the ASYCUDA team.	NBR, Custom Houses	2-3 years (mid-term target)
Moving to a paperless system	Phasing out the need for paper declarations and files towards a fully automated declaration and clearance system will save time and costs, particularly for perishable products. All regulatory agencies should start the initiative to make the provision to apply and issue their respective certificate, permit, license, other documents (CLPOs) online. A few blank pages can be created under the Single Administrative Document (SAD) of any bill of entry or export of ASYCUDA to be used as digital note sheets with the provisions of using Bangla Unicode (Nikosh font) to pave the way towards a paperless trade system.	NBR, Custom Houses, All regulatory agencies	2-3 years (mid-term target)
Full implementation of the electronic payment system	Full automation of the payment procedure for both the export and import processes is necessary to reduce the timing associated with payment of trade-related duties and fees. Customs is accepting e-payment for payment of duties and taxes in 95% of the cases but not being able to implement it fully due to challenges at the Banks' end. At present, some banks authorized for receiving treasury challan and e-payment are accepting e-payment till 4pm, which should be addressed and made at least be enhanced till 6pm to get the full benefit out of the e-payment system initiated by Customs. This will significantly impact the timing in TRS. Online submission of RTGS also requires physical submission of application form which retains the hassle of manual payment. This needs to be addressed to make the full system automated.	NBR, Bangladesh Bank, Custom Houses, regulatory agencies and schedule banks	2-3 years (mid-term target)
Multiple options for fee payment	Multiple options for fee payment (treasury challan, pay-order, online payment, payment at multiple banks) can also be thought of to make the process easier.	All agro-trade agencies	2-3 years (mid-term target)
Aligning banking hours	Banking hours at the port areas overall should be aligned with other agencies as delay in payments due to different operational hours, early closure and weekly holidays of banks at the port areas causes delay in payment making the clearance process time consuming. As Customs and port authorities and in cases regulatory agencies provide services beyond office hours, banks should also have such mechanism. In addition, RTGS processing should continue at least till 6pm, which, at present is 4pm or even 3:30pm, especially the banks other than Sonali Bank.	NBR, Bangladesh Bank, Sonali Bank, schedule banks	6-12 months (short term target)

<b>General</b>			
<b>Issues</b>	<b>Recommendation</b>	<b>Implementing body</b>	<b>Timeline</b>
Increase port capacity	Limited capacity of ports in terms of logistic and manpower contributes to delay in the overall clearance process. Assessments need to be done to identify the demand and develop the port capacity accordingly. PPP model can be followed for port development	Port Authorities	2-5 years (mid-term or long-term target)
Increasing manpower at the Custom Houses	The officers at the assessment group and the examination section of the three Custom Houses are overwhelmed. Therefore, it is worth considering increasing the number of officers at the three Custom Houses to	NBR	2-5 years (mid-term or long-term target)
Setting specific lunch hours and in-house meeting times for Customs/Port/OGAs officials	Establishing fixed lunch hours at staggered times for Customs/Port/OGAs officials is necessary to alleviate delays in the assessment process. Officers are frequently called for in-house meetings which delay the clearance process. The Custom Houses/Port/OGAs should set an official weekly meeting time, which will not disrupt and delay the clearance process.	Custom Houses, Port authorities, OGAs	6-12 months (short term target)
Identifying the gap time between submission of bills of entry/export and the actual initiation of the assessment process	In many cases, the C&F agent submits bills of entry/export (online) days before the assessment process begins, even well before accomplishing their readiness to do the function. This results in an unusually long-time calculation for Customs clearance in ASYCUDA. The gap between bill submission and the beginning of the assessment process needs further study to determine how best to target interventions. NBR can create provisions to record step-by-step data of actual initiation of assessment process in the ASYCUDA.  For example, in the case of exports, the time taken by the exporters in between submission of the bill of export and the inspection would be the most valuable measure for ensuring the accountability of the C&F agents/exporters in the clearance process.	Custom Houses, NBR	2-3 years (mid-term target)
Extended service for all the agencies related to Customs clearance	All offices and agencies involved in certification, Customs, and port operations should consider how to extend service hours, either by extending the work day from 8 to 12 or 16 hours, or by implementing a 6-day workweek.  Financial institutions should have a dedicated office in the port area that will offer weekend services to importers and exporters. This will significantly reduce the time of consignment release and product movement as weekends will no longer be the reason for payment processing and certification delays.	NBR, Custom Houses, banks, testing agencies	2-5 years (mid-term or long-term target)



Automating the process of issuing SAFTA RoO Certificates	Issuance of the SAFTA Rules of Origin certificate requires physical submission of the bill of export and other documentations. The certificate also needs to be collected from the offices of Export Promotion Bureau (EPB)—which takes considerable amount of time and causes delay in the forwarding process. In addition, EPB requires certification from OGAs present at the port to confirm products' export before issuing SAFTA RoO which again causes delay. Automating the service at the EPB's end integrating the agencies with the system will significantly reduce the clearance time to 50 minutes from 5 days.	MoC, EPB	6-12 months (Short-term Target)
Validity of Import Registration Certificate (IRC)	The validity of IRC should be given from the date of issue. In the present system, all IRCs' validity date is till June 30 and hence all IRCs need renewal on the same date creating a rush for the authority. Additionally, extending the IRC's validity by two to three years is recommended.	MoC, CCI&E	2-5 years (mid-term or long-term)
Addressing delays at Shipping Agents' end	Shipping agents do not issue delivery order (DO) after 3pm on weekdays. Some agents provide services for 2-3 hours on weekends but that is also not systematic. Though online system is in operation for issuing DO with information from the ASYCUDA, but in practice, hard copies of Bill of entry, packing list, invoice etc. and original copy of B/L needs to be submitted. The payment system is also not harmonized and different agents are following different payment methods which creates hassles and delays.	NBR, Port, Shipping Agents Association, Shipping agents	6-12 months (Short-term Target)
One-stop Service for approval and signatures	Approvals on different documents require signature from different offices which are away from each other. It is time consuming for the C&F agents to physically visit those offices and get the approvals. One-stop service in this regard will ease the process and significantly reduce the time.	NBR, Port, OGAs	2-5 years (mid-term or long-term target)
Development of Necessary Rules and Regulations	Development of Animal and Animal Quarantine Rules and Fish Quarantine Rules to streamline and structure the overall import and export procedure is crucial	MoFL, DoF, DLS	2-5 years (mid-term or long-term target)



# 9

## LIMITATIONS AND TAKEAWAYS FOR FUTURE TIME RELEASE STUDIES IN BANGLADESH



## 9. Limitations and Takeaways for Future TRSs in Bangladesh

A TRS is a unique tool to measure the performance of the border clearance agencies. Previous studies conducted in Bangladesh covered all imported and exported products. This TRS is the first of its kind in Bangladesh as it focuses on the clearance of agricultural commodities and food items. As the Government of Bangladesh increases its focus on enhancing trade facilitation, it is anticipated that TRS exercises may be conducted more frequently. The limitations of this study are therefore outlined below to help future TRS implementers to anticipate and respond to possible obstacles.

### **Lack of a diversified sample**

The team initially aimed to collect information on the bills of entry and bills of export for all products classified against HS chapters 1-24. However, due to random sampling and uneven flows of agricultural commodities and foodstuffs during the sampling period, not all chapters could be incorporated. From all three ports that were identified for the TRS, the sample of bills of entry contain fruits, vegetables, animal feed, foodstuffs, and fish (HS chapters 03, 07, 08, 09, 19, 20, 21, and 23), and the sample of bills of export contain fruits, vegetables, foodstuffs, and frozen fish (HS Chapters 03, 07, 08, 19, and 20). This may simply reflect the overall composition of Bangladesh's agricultural imports and exports, which is unlikely to be divided evenly across the 24 chapters. It is also affected by the seasonality of the sampling period (December 2021 through January 2022) and the agricultural products available during that time.

### **Lack of responses and cooperation of Customs and jetty sircars**

Questionnaires were completed by the Customs and jetty sircars, and the enumerators were prepared to assist them and follow up, as necessary. Despite repeated sensitization by the focal points of the three ports, and the Customs officials of Assessment group-1, the Customs and jetty sircars remained reluctant to complete the questionnaires. In many cases, the sircars were too busy to respond to the questionnaires, leading to a lower than expected number of responses.

### **Impact of Remuneration**

Providing remuneration for completed questionnaires can have both positive and negative impacts. The respondents either become motivated by the monetary incentives or questions whether they are being bribed. During this TRS, monetary incentives were found to motivate the respondents. However, in some cases respondents provided information on bills of entry that were not verifiable against the ASYCUDA World data and therefore could not be included in the samples.

## Questionnaire Design

Questionnaires should be developed with time constraints in mind. The questionnaire that the team used for data collection was shortened after the piloting process for precisely this reason. Despite these measures to accommodate respondents, the completion rate remained lower than expected. The team found that long questionnaires demotivated respondents. If data collection is conducted by the Custom Houses directly, they could mandate that respondents complete the questionnaires. However, this might inadvertently draw a biased response, as the Customs and jetty sircars are not likely to share information that portrays Custom Houses or the port authorities negatively.

## Response Biases

As per the TRS methodology, the team relied on information provided by the Customs and jetty sircars. However, the team found that some of the information provided did not match the ASYCUDA World data. These response biases were later adjusted to align with the data from the ASYCUDA World. Biases in response are common when tracking of individual bills of entry and export are not feasible.

## Lack of Information on Export Port Processing Procedures

At Chattogram port, the team encountered difficulties in finding information about the process after the completion of the off-dock processing. As C&F agents, and Customs and jetty sircars were the primary respondents, they were unable to provide information about the process handled by the shipping agent. The team contacted shipping agents, but their responses were low in number, and often they were not able to provide exact information on the timing for particular containers. Therefore, the TRS team sought assistance from the Chattogram Port Authority (CPA), which provided information on the arrival times of containers at the port entry gate and container loading times. However, information was unavailable for certain steps in the export process as the shipping agents and C&F agents were unable to provide this timing.



## Other Data Collection Techniques

Rather than relying on Customs sircars and C&F agents to provide timely information, an alternative strategy would be to utilize a single bill of entry and export and record the time of each step. However, it is very difficult to follow a particular bill of entry and export, as at least 3 to 4 Customs sircars simultaneously work on the clearance of each bill. Locating all four Customs and jetty sircars for each bill of entry would require a large number of enumerators to enter restricted port areas, and Custom Houses, which would not be efficient. An alternative would be to mark the file selected for the TRS sample with a sticker and put one enumerator at each step to track the file number and time. This method has two significant drawbacks. One, the Customs officials seeing those stickers will process the TRS files faster than the rest, as a result generating a biased result. Two, the Custom House and port premises are very crowded and always have a rush, so enumerators are likely to miss steps for specific file numbers. On the other hand, the data collection technique that we have followed is simple, and doable, but relies heavily on the information provided by the C&F agent, requiring validation from the ASYCUDA World data (from the central server). Every data collection technique has its flaws. Future researchers must decide which methodology will return the best results, taking into consideration the benefits and drawbacks of each.



**10**

# CONCLUSION



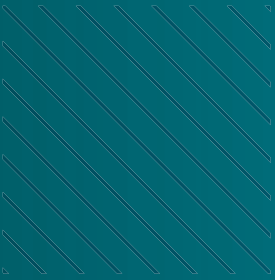
This TRS represents the first agro-focused TRS conducted in Bangladesh. Utilizing WCO guidelines, the research team assessed the average release times for imports and exports of agricultural commodities at the Benapole land port, the Chattogram seaport, and the Dhaka airport. The study provided detailed business process maps for imports and exports at each location and calculated the time for each step required for import/export clearance with a special emphasis on the average time required to receive clearances from BTF's five plus one counterpart agencies (PQW, DLS, DoF, BSTI, BAEC, and BCSIR).

The limitations of this study are shared to guide researchers when conducting future TRS exercises in Bangladesh. The data provided in this study are intended to help to analyze the impact of specific interventions directed towards the reduction of the average release time of agricultural commodities at the three selected ports.

The report provides concrete and action-oriented recommendations to significantly reduce the average clearance times for food and agricultural products. The recommendations, if implemented, will significantly contribute towards increasing the value and volume of agro trade leading towards building a developed nation by 2041.



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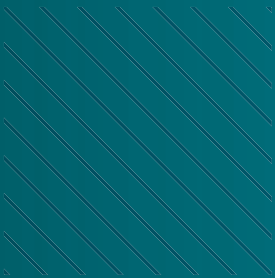
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# APPENDIX



# Appendix A: Questionnaires

## Appendix A1: Chattogram Questionnaire

Chattogram TRS Import	
(*) = Mandatory - if indicated for a section, mandatory questions for the section must be completed / if indicated for a question, the question must be completed if the section is used	
<b>Section A- TRS DATA (*)</b>	
1. Name of importer	
2. Business Identification Number	
3. Agent Identification Number	
4. Name of Vessel and Voyages/ Rotation Number	
5. Bills of Lading Number and Date	
6. Bills of Entry Number and Date	
7. Name of goods (HS code, if possible)	
8. Clearance channel	a) Outer anchorage, b) From port FCL, examined c) From Port FCL, not examined d) LCL, e) reefer container, f) From private ICDs/Off-docks, g) un-staffing, h) on chassis delivery
9. Relevant authorities (other than customs and port authority) for the clearance of goods	a) PQW, b) DLS, c) DoF, d) BSTI, e) BAEC, f) BCSIR
<b>Section B- PORT PROCESSING AFTER ARRIVAL OF VESSEL</b> <b>Date.....</b>	
10. Arrival of Vessel at anchor	hour_ min
11. Berthing	Yes_ No_
12. Discharge commences	hour_ min
13. Discharge ends	hour_ min
14. Off-dock processing	Yes_ No_
15. If off-dock processing- date and time cargo transferred	hour_ min
16. If off-dock processing- date and time cargo received at premises	hour_ min
<b>Section C- MANIFEST</b> <b>Date.....</b>	
17. Electronic copy of IGM received by Customs	hour_ min
18. Manifest rejected	Yes_ No_
19. INSTRUCTION- If the manifest is correct as submitted and not rejected go to question 30	hour_ min
20. Reason for rejection	wrong consignee_ wrong description_ Wrong date_ wrong weight_ wrong quantity_ other_
21. Date and time of manifest rejection	hour_ min

22. Rejected manifest received by shipping agent	hour_ min
23. Manifest returned to Customs	hour_ min
24. Referred to Assistant Commissioner for penalty assessment	hour_ min
25. Penalty paid at bank	hour_ min
26. Corrected manifest submitted to IGM section	hour_ min
27. Referred to Assistant Commissioner for approval of correction	hour_ min
28. Assistant Commissioner's approval of correction	hour_ min
29. Corrected manifest received in IGM section	hour_ min
30. Manifest approved online	hour_ min
31. Customs register manifest information into ASYCUDA	hour_ min
32. Printed manifest is given to C&F agent	hour_ min
<b>SECTION E - ASSESSMENT AND PHYSICAL EXAM</b> <span style="float: right;">Date.....</span>	
<b>Sub Section A - Assessment</b>	
33. C&F Agent submits a hard copy of the file (including other documents) to Revenue Officer	hour_ min
34. Revenue Officer marks file to Assistant Revenue Officer (selected by ASYCUDA World) and returns to C&F Agent	hour_ min
35. C&F Agent submits the file to Assistant Revenue Officer	hour_ min
36. Are Other Government Agency (OGA) Certificates required	hour_ min
37. INSTRUCTION- If yes, fill 38-41	
38. Customs refers entry package to Customs higher authority for issuance of the letter to the OGA concerned	hour_ min
39. Letter to OGA issued	hour_ min
40. File returned to C&F agent to obtain OGA certificate	hour_ min
41. Customs receives certificate/ C&F Agent resubmits file with OGA certificates	hour_ min
42. Assistant Revenue Officer marks the file for the exam based on ASYCUDA selectivity if necessary and returns the file to C&F Agent (*)	hour_ min
43. Decision to physically exam based on ASYCUDA selectivity	Yes_ No_
<b>Subsection B - Physical Exam</b> <span style="float: right;">Date.....</span>	
44. C&F agent submits documents in Folder Exit Room	hour_ min
45. Dispatch number and file created	hour_ min
46. C&F agent submits Documents at the jetty to Joint Commissioner	hour_ min
47. Appropriate documents referred to off-dock offices/ jetty offices	hour_ min
48. Appropriate documents received at off-dock offices/ jetty offices	hour_ min
49. Agent obtains the location of goods from Port Authority and advises Customs	hour_ min
50. Examining officer assigned by Assistant Commissioner	hour_ min
51. Agent delivers documents to Examining officer	hour_ min
52. Examining officer verbally advises C&F Agent of time and date of exam	hour_ min
53. C&F Agent proceeds to Indent Section of Port Authority to arrange the keep down of container	hour_ min

54. Indent Section of Port Authority advises when the container will be available for examination	hour_ min
55. Scheduled time for examination	hour_ min
56. Time goods available for examination	hour_ min
57. Examination commenced	hour_ min
58. OGA examination concurrent with Customs exam (if needed)	Yes__ No__
59. If the OGA exam is not concurrent with the Customs exam, state name of OGA	
60. OGA examination commenced	hour_ min
61. OGA examination completed	hour_ min
62. Selected for scanning	Yes__ No__
63. If scanning required - date and time commenced	hour_ min
64. If scanning required - date and time ended	hour_ min
65. Examination and examination report completed	hour_ min
66. Examination report submitted to Assistant or Joint Commissioner	hour_ min
67. Approved examination report and samples returned to Revenue Officer - Assessment Section	hour_ min
<b>Subsection C - Assessment process continued - after examination Date.....</b>	
68. Examination findings and samples in accordance with the declaration, if yes go to 74	Yes__ No__
69. If no - agent pays appropriate duty and penalty	Yes__ No__
70. Application submitted requesting a review of assessment	Yes__ No__
71. Application referred to higher authority/assessment committee/court	hour_ min
72. Specify where the application referred	Higher authority__ Assessment Committee__ Court__
73. Decision given by higher authority/assessment committee/court	hour_ min
74. Assessment notice printed	hour_ min
75. Assessment notice referred to Revenue Officer for approval	hour_ min
76. Assessment Notice approved and signed	hour_ min
77. Assessment notice returned to C and F agent	hour_ min
<b>Section F - OUT PASS SECTION</b> <b>Date.....</b>	
78. Documents received in the out-pass section	hour_ min
79. Information recorded in register	hour_ min
80. Seal applied and out pass created	hour_ min
<b>Section G - PAYMENT OF DUTY</b> <b>Date.....</b>	
81. C&F Agent submit Assessment Notice to Sonali Bank	hour_ min
82. Sonali Bank (e-payment) process- commences	hour_ min
83. Sonali Bank (e-payment) process- ends	hour_ min
84. Paid bank receipt returned to the C&F agent	hour_ min
<b>Section H - RELEASE ORDER<sup>1</sup></b> <b>Date.....</b>	
85. C&F agent submits bank receipt to the ARO (assessment)	hour_ min
86. ARO enters payment information into ASYCUDA	hour_ min
87. Release order printed and verified	hour_ min
88. Approved release order given to C&F Agent	hour_ min
<b>Section I - PORT AUTHORITY CLEARANCE</b> <b>Date.....</b>	
89. For LCL cargo- correction of marks and numbers -	hour_ min

<sup>1</sup> Data collection and piloting shows that the payment process is mostly online, and the release order section is not carried out. After payment of duties the information of payment is directly sent to the jetty/off dock office.

90. LCL cargo - correction of marks and numbers - finishes	hour_ min
91. C&F Agent obtains Delivery Order from Shipping Agent - commences	hour_ min
92. C&F Agent obtains Delivery Order - ends	hour_ min
93. Release Order and Delivery Order submitted to Port Authority by C&F Agent	hour_ min
94. Port Authority Review of IGM -commences	hour_ min
95. Port Authority Review of IGM ends	hour_ min
96. Billing Clerk prepares port dues and bill - commences	hour_ min
97. Billing Clerk calculates port dues and bill generated	hour_ min
98. C&F Agent pays port dues at the bank - commences	hour_ min
99. C&F Agent pays port dues at the bank -ends	hour_ min
100. Port Release Order with seal and signature by Port Authority	hour_ min
101. Indent to port Authority for delivery of consignment - commences	hour_ min
102. Indent to Port Authority for delivery of consignment - ends	hour_ min
103. C&F Agent obtains permission from Traffic Inspector for cargo being released that day	hour_ min
104. Laborer appointment from Berth Operator - commences	hour_ min
105. Laborer appointment from Berth Operator - ends	hour_ min
106. Cart ticket purchased for entry of trucks into the yard - commences	hour_ min
107. Car ticket purchased for entry of trucks into the yard - ends	hour_ min
108. De-stuffing of containers and loading of domestic trucks-begins	hour_ min
109. De-stuffing of containers and loading of domestic trucks-ends	hour_ min
110. Cargo proceeds to exit gate	hour_ min
<b>Section J- Release of Goods</b>	<b>Date.....</b>
111. The arrival of cargo at the exit gate	hour_ min
112. Customs ARO at gate verifies release order in ASYCUDA and Port Authority Release Order	hour_ min
113. Customs hold on cargo by the intelligence agency	hour_ min
114. Red block imposed by Assessing Officer	hour_ min
115. Red block cancelation application submitted	hour_ min
116. Red block canceled	hour_ min
117. The Release of goods	hour_ min
<b>Section K - COMMENTS</b>	<b>Date.....</b>
118. Use this section to record any reasons for extraordinary circumstances that affected the time taken to release the goods	
(*) = Mandatory - if indicated for a section, mandatory questions for the section must be completed / if indicated for a question, the question must be completed if the section is used	



<b>Chattogram TRS Export</b>	
<b>(*) = Mandatory- If indicates for a section, mandatory questions for the section must be completed / of indicated for question, the question must be completed if the section is used</b>	
<b>Section A- TRS Data (*)</b>	
1.Name of exporter	
2. Business Identification Number	
3. Agent Identification Number	
4. Name of Vessel	
5. Bills of Export Number and Date	
6. Name of goods (HS code)	
<b>Section B- Arrival of Cargo at Depot/off-dock</b> <span style="float: right;"><b>Date.....</b></span>	
7. Date and time of cargo Arrival to off-docks	hour_ min
<b>Section C- Assessment</b> <span style="float: right;"><b>Date.....</b></span>	
8. Bills of Export submitted online	hour_ min
9. C&F agents submit a hard copy of the Bills of export and supporting documents to the ARO (Assessment)	hour_ min
10. Assistant Revenue officer commences assessment	hour_ min
11. EXP form properly completed	Yes_ No_
12. INSTRUCTION - if the answer to the above is YES, go to question 14	
13. C&F Agent submits corrected EXP form	hour_ min
14. Assistant Revenue officer completes assessment by endorsing Bills of Export and supporting documentation	hour_ min
15. Assessment and documentation forwarded to revenue officer approval	hour_ min
16. C&F agent submits the file to the RO (Assessment)	hour_ min
17. Revenue officer approves the assessment	hour_ min
18. Revenue officer prints assessment notice	hour_ min
<b>Section D- Payment of applicable fees</b> <span style="float: right;"><b>Date.....</b></span>	
19. C&F agent Submits documentation to Sonali Bank	hour_ min
20. Sonali bank e-payment process commences	hour_ min
21. Sonali bank e-payment Process ends	hour_ min
22. Bank endorses Assessment Notice and returns to C & F agent	hour_ min
23. Bank electronically communicates payment information to Customs	hour_ min
<b>Section E- Off-dock Procedures</b> <span style="float: right;"><b>Date.....</b></span>	
24. C&F agent obtains truck manifest	hour_ min
25.C&F Agent presents truck manifest to the off-dock desk clerk	hour_ min

26. Clerk assigns a serial number on manifest for entry to the off-dock area and returns to C&F Agent	hour_ min
27. C&F Agent presents serial number at the entrance gate	hour_ min
28. Truck enters the off-dock area	hour_ min
29. Un-loading of trucks -commence	hour_ min
30. Un-loading of trucks- ends	hour_ min
31. C&F Agent submits Bills of Export and Assessment Notice to the desk clerk	hour_ min
32. Desk clerk endorses quantity and returns documents to C&F Agent	hour_ min
33. C&F Agent submits documents to off-dock Customs	hour_ min
34. Customs applies blank examination report and allowed stamp and returns documents to C&F Agent	hour_ min
35. C&F Agent returns to desk clerk for drawing of samples	hour_ min
36.C&F Agent obtains samples and submits documents to ARO	hour_ min
37. ARO checks documents and samples commence	hour_ min
38. ARO checks documents and samples-ends	hour_ min
39. ARO endures Bills of Export of Submits to RO	hour_ min
40. RO Endorses Bills of Export and submits to AC if needed	hour_ min
41. AC Endorses Bill Export if needed	hour_ min
42. Documents returned to C&F Agent	hour_ min
43. C&F Agent presents approved documents to the off-dock desk clerk	hour_ min
44. Payment of off-dock dues-commences	hour_ min
45. payment of off-dock dues-ends	hour_ min
46. Receipted copy of export documents returned to C&F Agent	hour_ min
47. Off-dock desk clerk advises Shipping Agent that cargo available for export	hour_ min
48. Stuffing of container in presence of Customs- starts	hour_ min
49. stuffing of container in presence of Customs- Ends	hour_ min
50. Container sealed in presence of Customs	hour_ min
51. Off-dock submits stuffing report & Bills of Export to shipping Agent	hour_ min
52. Shipping agent submits container numbers and export documents to feeder operator	hour_ min
<b>Section F -port Authority procedures</b>	<b>Date.....</b>

53. Shipping Agent submits hard copies of documents to Feeder Operator	hour_ min
54. Feeder operator submits export documents to the terminal manager of port	hour_ min
55. Terminal manager verifies documents -starts	hour_ min
56. Terminal manager verifies documents-ends	hour_ min
57. Terminal managers issues gate pass	hour_ min
58. Terminal manager permits loading of container on designated vessel	hour_ min
<b>Section G- Release and Export</b>	
	<b>Date.....</b>
59. Container arrives at the port entry gate	hour_ min
60. Gate sergeant checks documentation for entry into port	hour_ min
61. ARO verifies release in ASYCUDA	hour_ min
62. Loading of vessel-commences	hour_ min
63. Loading of the vessel- ends	hour_ min
64. Shipping Agent obtains clearance certificate from Customs-commences	hour_ min
65. Shipping Agent obtains clearance certificate from port Authority-Ends	hour_ min
66. Shipping Agent obtains clearance certificate from port Authority-Commences	hour_ min
67. Shipping Agent obtains clearance certificate from port Authority- ends	hour_ min
<b>Section H- Others</b>	
68. Have you ever faced rejection of your consignment from the importer of the export destination?	Yes_ No_
69. If yes, please state the reasons	
70. Have you faced rejection of any consignment on the ground of non-compliance by the domestic regulatory authorities?	Yes_ No_
71. If yes, please state the reasons	

# Appendix A2: Dhaka questionnaire

Dhaka TRS Import			
1.	Name of the importer		
2.	Business Identification Number (BIN)		
3.	Agent Identification Number (AIN)		
4.	Bills of Entry, Number, and Date (*)		
5.	Manifest Number and Date (*)		
6.	Type of goods (*) (HS Code)		**Name of product
7.	Bills of landing /Air Waybill (Number) (*)		

8.	Clearance scenario (*) (Chose more than one option, if required)	A. Freight (examined)	B. Freight (not examined)
		C. Sample collected, and goods tested	D. De-minimis Cargo
		E. Express courier	F. Perishable commodities
9.	Clearance agencies, other than Customs and port authority (*) (Chose more than one option, if required)	A. PQW	B. DLS
		C. DoF	D. BSTI
		E. BAEC	F. Others (BCSIR, etc.)

### The arrival of air cargo

1.	IGM submission date and time (online) (*)	___Day___month___hour___min.	
2.	Air cargo arrival, date and time (*)	___Day___month___hour___min.	
3.	Unloading starts	___Day___month___hour___min.	
4.	Unloading ends	___Day___month___hour___min.	
5.	Goods transferred to godown of import village-starts	___Day___month___hour___min.	
6.	Goods transferred to godown of import village-ends	___Day___month___hour___min.	
7.	comment: Any events that affected the clearance process		
8.	Total time to complete the process		

### Assessment Phase 1

9.	C&F agent submits bills of entry (online) (*)	___Day___month___hour___min.	
10.	C&F agents submits hard copy of file/folder to ASYCUDA designated ARO	___Day___month___hour___min.	
11.	ARO commences assessment (*)	___Day___month___hour___min.	
12.	OGA (Other Government Agency) certification required?	"Yes" ___ "No" ___	

13.	Letter issued to OGA	___Day___month___hour___min.	
14.	File returned to C&F agent to collect OGA certificates	___Day___month___hour___min.	
15.	ARO marks file for physical examination, if necessary	___Day___month___hour___min.	
16.	comment: Any events that affected the clearance process		
17.	Total time to complete the process		

### Examination

18.	C&F submits file/folder to the RO (examination) (*)	___Day___month___hour___min.	
19.	RO refers file to an ARO and returns file to the C&F agent	___Day___month___hour___min.	
20.	C&F submits file to the ARO (examination) (*)	___Day___month___hour___min.	
21.	Is shipment subject to OGA inspection? (*)	"Yes" ___ "No" ___	
22.	If 21 is yes, does the Customs examination and OGA examination occur simultaneously?	"Yes" ___ "No" ___	
23.	ARO collects sample and starts examination in presence of the OGA representatives (if necessary) (*)	___Day___month___hour___min.	
24.	If 21 is no, then the time of commencing of OGA examination? (*)	___Day___month___hour___min.	
25.	Sample collection (*)	___Day___month___hour___min.	
26.	Sample sent to Custom House	___Day___month___hour___min.	
27.	Samples sent to the OGA	___Day___month___hour___min.	
28.	Exam ends and report submitted by OGA (*)	___Day___month___hour___min.	
29.	Sample testing in accordance with the declaration? (*),	"Yes" ___ "No" ___	
30.	If 29 is no, then date and time of the result noted in file	___Day___month___hour___min.	
31.	Date and time of further examination, if necessary	___Day___month___hour___min.	
32.	Further examination ends	___Day___month___hour___min.	
33.	ARO returns file to the C&F agent (*)	___Day___month___hour___min.	
34.	C&F agent submits file to the RO (examination) (*)	___Day___month___hour___min.	

35.	RO approves examination report and returns file to C&F agent to send it to Custom House	___Day___month___hour___min.	
36.	RO (examination) signs the completed file and sends file to ARO (assessment) (*)	___Day___month___hour___min.	
37.	comment: Any events that affected the clearance process		
38.	Total time to complete the process		

### Assessment phase 2

39.	C&F agents submits file with testing report to the ARO (assessment) (*)	___Day___month___hour___min.	
40.	ARO (assessment) verifies examination report and other documents and gives file back to C&F agent to submit file to RO (assessment)	___Day___month___hour___min.	
41.	C&F agent submits file to RO (*)	___Day___month___hour___min.	
42.	RO verifies assessment and returns file to the C&F agent (*)	___Day___month___hour___min.	
43.	File sent to group AC/DC for finalization (if necessary)	___Day___month___hour___min.	
44.	If adjudication is required, the file is sent to the concerned adjudicating officer	"Yes" ___ "No" ___	
45.	For finalization of assessment and printing of assessment notice file is returned to ARO (assessment)	___Day___month___hour___min.	
46.	ARO prints assessment notice and returns file to C&F agent	___Day___month___hour___min.	
47.	comment: Any events that affected the clearance process		
48.	Total time to complete the process		

### Duty payment at the Bank

49.	C&F commences duty payment at the bank (*) (online available)	___Day___month___hour___min.	
50.	C&F finishes duty payment at the bank (*)	___Day___month___hour___min.	
51.	C&F submits bank receipt to the ARO (assessment) (*)	___Day___month___hour___min.	
52.	ARO prints release order (*)	___Day___month___hour___min.	
53.	comment: Any events that affected the clearance process		
54.	Total time to complete the process		

Release			
55.	C&F agent submits release order to Biman	___Day___month___hour___min.	
56.	Port dues are calculated and notified to the C&F agent	___Day___month___hour___min.	
57.	C&F agent pays port dues/storage charges at the bank (*)	___Day___month___hour___min.	
58.	C&F agent submits bank receipt to Biman (*)	___Day___month___hour___min.	
59.	Document port verification commences (*)	___Day___month___hour___min.	
60.	Document port verification ends (*)	___Day___month___hour___min.	
61.	Biman issues exit note (*)	___Day___month___hour___min.	
62.	Date and time of issuance of delivery note (*)	___Day___month___hour___min.	
63.	Date and time of final release (*)	___Day___month___hour___min.	
64.	comment: Any events that affected the clearance process		
65.	Total time to complete the process		

Dhaka TRS Export	
1. Name of Exporter	
2. Business Identification Number	
3. Agent Identification Number	
4. Bills of Export Number and Date (*)	
5. Type of Goods (*)	
6. Name of Goods (*)	

Assessment at the Custom House	
7. Agent submits Bills of Export (online) (*)	___day___mth___hr___min
8. Agents submits hard copy of Bills of Export and supporting documents (within a file) to ARO (*)	___day___mth___hr___min
9. Assistant Revenue Officer commences assessment (*)	___day___mth___hr___min
10. Assistant revenue officer completes assessment by endorsing Bills of Export (*)	___day___mth___hr___min
11. Endorsed file returned to C&F Agent	___day___mth___hr___min
12. C&F Agent submits file to Revenue Officer (*)	___day___mth___hr___min
13. Amendments required	Yes ___ No ___
14. INSTRUCTION- if answer to above is NO, go to question 22	
15. File returned to C&F Agent for correction	___day___mth___hr___min
16. C&F Agent submits corrected file	___day___mth___hr___min
17. Customs enters data into ASYCUDA and prints corrected Bills of Export	___day___mth___hr___min
18. File returned to C&F Agent	___day___mth___hr___min
19. C&F agent submits file to revenue Officer	___day___mth___hr___min

20. Revenue Officer approves assessment and prints Assessment notice (*)	__day__mth__hr__min
21. File and assessment Notice returned to C&F agent (*)	__day__mth__hr__min
22. COMMENT: Use this section to record any extra ordinary circumstances that affected the assessment process	

#### Gate pass issue and entry of the truck in the export village

23. C&F Agent commences issuing of the gate pass (*)	__day__mth__hr__min
24. Gate pass issued (BIMAN) (*)	__day__mth__hr__min
25. C&F Agent commences issuing driver's pass	__day__mth__hr__min
26. Driver's pass issued (BIMAN) (*)	__day__mth__hr__min
27. Truck stands in queue in front of the gate (*)	__day__mth__hr__min
28. Truck enters the gate (*)	__day__mth__hr__min
29. Weighing starts (*)	__day__mth__hr__min
30. Weighing ends	__day__mth__hr__min
31. unloading starts (*)	__day__mth__hr__min
32. unloading ends	__day__mth__hr__min
33. COMMENT: Use this section to record any extra ordinary circumstances that affected the process	

#### Examination at the Export Village

34. C&F Agent submits file to Revenue Officer at export village (*)	__day__mth__hr__min
35. Revenue Officer marks ARO for examination (*)	__day__mth__hr__min
36. Assistant Revenue Officer commences examination (*)	__day__mth__hr__min
37. Examination ends (*)	__day__mth__hr__min
38. File returned to C&F Agent	__day__mth__hr__min
39. C&F agent submits file to revenue Officer (*)	__day__mth__hr__min
40. Revenue Officer approves examination (*)	__day__mth__hr__min
41. C&F agent pays Customs administrative fees (pre-payment) and release order issued (*)	__day__mth__hr__min
42. COMMENT: Use this section to record any extra ordinary circumstances that affected the assessment process	

#### Scanning by Civil Aviation Authority and transfer of good to airlines authority

43. C&F agent submits documents for scanning permission to Civil Aviation Authority (*)	__day__mth__hr__min
44. Scanning permission granted (*)	__day__mth__hr__min
45. Scanning of goods commences (*)	__day__mth__hr__min
46. Scanning ends (*)	__day__mth__hr__min
47. AWB issued by airlines authority (*)	__day__mth__hr__min
48. Goods handed over to airline authority (by Biman) (*)	__day__mth__hr__min
49. Flight leaves	__day__mth__hr__min
50. COMMENT: Use this section to record any extra ordinary circumstances that affected the scanning process	

#### Others

51. Have you ever faced rejection of your export consignment from the importer?	Yes __ No __
52. If yes, then elaborate on the cause of rejection	
53. Have any of your consignments faced rejection due to non-compliance?	Yes __ No __
52. If yes, then elaborate on the cause of rejection	



# Appendix A3: Banapole Questionnaire

<b>Benapole TRS Import</b>	
(*) = Mandatory - if indicated for a section, mandatory questions for the section must be completed/if indicated for a question, the question must be completed if the section is used	
<b>Section A- TRS Data (*)</b>	
1. Name of Importer	
2. Business Identification Number	
3. Agent Identification Number	
4. Bills of Entry Number and Date	
5. Manifest Number and Date	
6. Type of Product	
7. Name of goods (including HS code, if possible)	
8. Truck Receipt Number	
9. Required OGA certificate (put tick mark)	a) PQW    b) DLS    c) DoF d) BSTI    e) BAEC    f) BCSIR
<b>Section B- Cargo Branch</b>	
10. Date and time border-man present documents at Cargo Branch	day_ month_ hour_ min
11. Cargo Branch assigns a manifest number to four copies of the manifest; signs copies of Indian Car Pass	day_ month_ hour_ min
12. Date and Time documents returned to border-man (*)	day_ month_ hour_ min
13. Date and time of arrival of the truck at the border (*)	day_ month_ hour_ min
14. Date and time documents presented at the entry point (by the driver) (*)	day_ month_ hour_ min
15. Customs officer records car pass data in BCOM software-commences	day_ month_ hour_ min
16. Customs officer records car pass data in BCOM software-ends	day_ month_ hour_ min
17. Customs enters Manifest in the ASYCUDA World- commences	day_ month_ hour_ min
18. Customs enters Manifest in the ASYCUDA World- ends	day_ month_ hour_ min
19. Manifest marked for weighing	Yes_ No_
20. INSTRUCTION: If answer is NO go to question 23	
21. Date and Time loaded truck arrives at Customs Weighing Station	day_ month_ hour_ min
22. Date and time loaded truck leaves Customs Weighing Scale with a weighing slip	day_ month_ hour_ min
23. Manifest rejected for correction	Yes_ No_
24. INSTRUCTION: If NO go to question 33	
25. Manifest returned to Agent for correction	day_ month_ hour_ min
26. Referred to Assistant Commissioner for penalty assessment	day_ month_ hour_ min

27. Assistant Commissioner approves penalty and returns file to Cargo Branch	day_ month_ hour_ min
28. Agent pays penalty at bank	day_ month_ hour_ min
29. Corrected manifest returned to Customs	day_ month_ hour_ min
30. Corrected manifest referred to Assistant Commissioner for approval	day_ month_ hour_ min
31. Approved corrected manifest returned to Cargo Branch	day_ month_ hour_ min
32. COMMENT: Use this section to record any extraordinary circumstances that affected the time taken in the Cargo Branch	
<b>Section C- Simplified Procedure (perishable (fruits, vegetables, corns, fish, cut flower), oxygen, etc.)</b>	
33. Is the shipment subject to simplified procedures?	Yes_ No_
34. INSTRUCTION - If NO, proceed to Section D questions	
35. Date and time truck arrives at Shed 31	day_ month_ hour_ min
36. Date and time weighing commences	day_ month_ hour_ min
37. Date and time weighing ends	day_ month_ hour_ min
38. Unloading of truck- commences	day_ month_ hour_ min
39. Unloading of truck – ends	day_ month_ hour_ min
40. loading of goods to Bangladeshi Truck - commences	day_ month_ hour_ min
41. loading of goods to Bangladeshi Truck - ends	day_ month_ hour_ min
42. COMMENT: Use this section to record any extraordinary circumstances that affected the time taken in Simplified Procedures	
<b>Section D- Truck Terminal of India (TTI) Yard (if not perishable (chips, chocolate, Bournvita, milk powder, seeds, etc.)</b>	
43. Date and time truck arrives at TTI yard	day_ month_ hour_ min
44. Date and time weighing commences	day_ month_ hour_ min
45. Date and time weighing ends	day_ month_ hour_ min
46. Date and time truck arrives at Shed Posting office	day_ month_ hour_ min
47. Date and time shed posting is given	day_ month_ hour_ min
48. Date and time truck leaves Shed Posting Office	day_ month_ hour_ min
49. COMMENT: Use this section to record any extraordinary circumstances that affected the time taken in Section D	
<b>Section E-Port Authority Shed Area (Warehouse) (for non-perishable agro-processed items)</b>	
50. Date and time truck arrives at shed area	day_ month_ hour_ min
51. Unloading of truck-commences	day_ month_ hour_ min
52. Unloading of truck- ends	day_ month_ hour_ min
53. COMMENT: Use this section to record any extraordinary circumstances that affected the time taken in Section E	

<b>Section F- Assessment – Phase I</b>	
54. C&F Agent submits Bills of Entry and documentation manually to the DTI clerk (*)	day_ month_ hour_ min
55. DTI clerk enters Bills of Entry data into ASYCUDA and prints Bills of Entry	day_ month_ hour_ min
56. Bills of Entry package printed and returned to C&F Agent	day_ month_ hour_ min
57. DTI clerk assigns file number, creates manual file and returns file to the C&F Agent	day_ month_ hour_ min
58. C&F Agent submits file to Revenue Officer	day_ month_ hour_ min
59. Revenue Officer marks file to Assistant Revenue Officer (selected by ASYCUDA World) and returns to C&F Agent	day_ month_ hour_ min
60. C&F Agent submits file to Assistant Revenue Officer	day_ month_ hour_ min
61. Are required Other Government Agency (OGA) Certificates missing	yes_ No_
62. INSTRUCTION: If NO go to question 67	
63. Customs refers file to higher authority for issuance of letter to OGA	day_ month_ hour_ min
64. Letter to OGA issued	day_ month_ hour_ min
65. File returned to C&F Agent in order to obtain certificates	day_ month_ hour_ min
66. C&F Agent resubmits file with OGA certificates	day_ month_ hour_ min
67. Assistant Revenue Officer marks file for exam, if necessary and returns to C&F Agent (*)	day_ month_ hour_ min
68. COMMENT: Use this section to record any extraordinary circumstances that affected the time taken in Section F	
<b>Section G- Examination</b>	
69. Is the shipment subject to simplified procedures	yes_ No_
70. C&F Agent delivers file to Revenue Officer/ Assistant Commissioner at examination location	day_ month_ hour_ min
71. Revenue Officer/Assistant Commissioner assigns file to Assistant Revenue Officer and returns file to C&F Agent	day_ month_ hour_ min
72. C&F Agent submits file to Assistant Revenue Officer at appropriate shed	day_ month_ hour_ min
73. Assistant Revenue Officer obtains samples and examination commences	day_ month_ hour_ min
74. Assistant Revenue Officer obtains samples and examination ends	day_ month_ hour_ min
75. Is shipment subject to an OGA examination	Yes_ No_
76. If yes-was OGA exam conducted at same time as Customs exam	Yes_ No_
77. If no-date and time OGA exam commenced (sample collected by the respective authorities)	day_ month_ hour_ min
78. If no- date and time OGA exam ended (results received)	day_ month_ hour_ min
79. Examination and samples in accordance with declaration	Yes_ No_
80. INSTRUCTION: If answer to above is Yes, go to question 84	
81. If examination differs from declaration, date and time findings are noted in file	day_ month_ hour_ min

82. Date and time further examination commences	day_ month_ hour_ min
83. Date and time further examination ends	day_ month_ hour_ min
84. Assistant Revenue Officer returns file to C&F Agent with examination report signed	day_ month_ hour_ min
85. C&F Agent delivers file to Assistant Revenue Officer/Assistant Commissioner at examination location	day_ month_ hour_ min
86. Revenue Officer/Assistant Commissioner Exam signs the file and refers it to Revenue Officer Assessment and gives file to C&F Agent	day_ month_ hour_ min
87. COMMENT: Use this section to record any extraordinary circumstances that affected the time taken in Section H any extraordinary circumstances that affected the time taken in Section G	
<b>Section H- Assessment - Phase II</b>	
88. C&F Agent submits file to Revenue Officer Assessment	day_ month_ hour_ min
89. Revenue Officer Assessment refers file to Assistant Revenue Officer	day_ month_ hour_ min
90. Assistant Revenue Officer analyses findings of examination and checking of import documents starts	day_ month_ hour_ min
91. Assistant Revenue Officer documents his observations and forwards file to Revenue Officer	day_ month_ hour_ min
92. Is penalty applicable	Yes_ No_
93. INSTRUCTION: If answer is NO, go to question 105	
94. Date and time Revenue Officer refers file to file to Assistant Commissioner for penalty assessment	day_ month_ hour_ min
95. Date and time file referred to Joint Commissioner, if necessary	day_ month_ hour_ min
96. Date and time file referred to Commissioner, if necessary	day_ month_ hour_ min
97. Date and time decision received from higher authority (AC, JC or Commissioner as appropriate)	day_ month_ hour_ min
98. Adjustment to Bills of Entry required	Yes_ No_
99. INSTRUCTION: If NO, go to question 105	day_ month_ hour_ min
100. Date and time referred to Entry Branch	day_ month_ hour_ min
101. Date and time Entry Branch completes adjustments to Bills of Entry	day_ month_ hour_ min
102. Date and time Entry Branch sends adjusted Bills of Entry and file to Assistant Revenue Officer	day_ month_ hour_ min
103. Date and time Assistant Revenue Officer approves adjusted Bills of Entry and refers to Revenue Officer	day_ month_ hour_ min
104. Date and time Revenue Officer approves adjusted Bills of Entry	day_ month_ hour_ min
105. Date and time Revenue Officer approves assessment	day_ month_ hour_ min
106. Date and time Revenue Officer enters assessment into ASYCUDA	day_ month_ hour_ min
107. Date and time Revenue Officer prints assessment Notice and hands over to the C&F agent	day_ month_ hour_ min

108. COMMENT: Use this section to record any extraordinary circumstances that affected the time taken in Section H	
<b>Section I- Payment of Duty and Taxes- release Order</b>	
109. C&F Agent pays assessment notice at bank - commences	day_ month_ hour_ min
110. C&F agent pays assessment notice at bank - ends	day_ month_ hour_ min
111. Bank submits bank receipt to Customs	day_ month_ hour_ min
112. Date and time Release Order printed	day_ month_ hour_ min
113. COMMENT: Use this section to record any extraordinary circumstances that affected the time taken in Section I	
<b>Section J- Port Authority Release</b>	
114. C&F Agent submits paid assessment Notice and Release Order to DTM Building	day_ month_ hour_ min
115. Port dues calculated, and calculations given to C&F Agent	day_ month_ hour_ min
116. C&F Agent pays port dues to bank employee-commences	day_ month_ hour_ min
117. C&F Agent pays port dues to bank employee- ends	day_ month_ hour_ min
118. C&F Agent submits bank receipt at Port Revenue Building	day_ month_ hour_ min
119. Port verification of documents - commences	day_ month_ hour_ min
120. Port verification of documents - ends	day_ month_ hour_ min
121. Date and time loading order and gate pass issued and received by the C&F agent	day_ month_ hour_ min
122. C&F Agent takes loading order and gate pass to appropriate shed for endorsement	day_ month_ hour_ min
123. Documents endorsed by Port Authority	day_ month_ hour_ min
124. Documents endorsed by C&F Agent	day_ month_ hour_ min
125. Documents endorsed by the In-Charge at shed	day_ month_ hour_ min
126. Documents endorsed by Customs examining Assistant Revenue Officer	day_ month_ hour_ min
127. Loading of truck - commences	day_ month_ hour_ min
128. Loading of truck – ends	day_ month_ hour_ min
129. Truck exits through exit gate	day_ month_ hour_ min
130. COMMENT: Use this section to record any extraordinary circumstances that affected the time taken in Section J	
<b>Section K- Joint Check Point - Customs and Border Guard Bangladesh</b>	
131. C&F Agent submits file to checkpoint	day_ month_ hour_ min
132. Customs verifies release status in ASYCUDA commences	day_ month_ hour_ min
133. Customs verifies release status in ASYCUDA - ends	day_ month_ hour_ min
134. Customs and Border Guard endorse release	day_ month_ hour_ min
135. Date and time truck leaves checkpoint (*)	day_ month_ hour_ min
136. COMMENT: Use this section to record any extraordinary circumstances that affected the time taken in Section K	

<b>Benapole TRS Export</b>	
(*) = Mandatory - if indicated for a section, mandatory questions for the section must be completed/if indicated for a question, the question must be completed if the section is used	
<b>Section A- TRS Data (*)</b>	
1. Name of Exporter	
2. Business Identification Number	
3. Agent Identification Number	
4. Bills of Export Number and Date	
5. Manifest Number and Date	
6. Type of Product	
7. Name of Goods	
<b>Section B- Assessment</b>	
8. C&F agent submits hard copy of Bills of Export and supporting documentation (*)	day_ month_ hour_ min
9. DTI clerk enters data into ASYCUDA and prints Bills of Export	day_ month_ hour_ min
10. DTI clerk creates file and returns file to C&F Agent	day_ month_ hour_ min
11. C&F Agent submits file to Assistant Revenue Officer	day_ month_ hour_ min
12. Assistant Revenue Officer commences assessment	day_ month_ hour_ min
13. EXP form properly completed	Yes_ No_
14. INSTRUCTION - if answer to above is YES, go to question 17	
15. EXP form returned to C&F Agent for correction	day_ month_ hour_ min
16. C&F Agent submits corrected EXP form	day_ month_ hour_ min
17. Assistant Revenue Officer completes assessment by endorsing Bills of Export	day_ month_ hour_ min
18. Endorsed file returned to C&F Agent	day_ month_ hour_ min
19. C&F Agent submits file to Revenue Officer	day_ month_ hour_ min
20. Amendments required	Yes_ No_
21. INSTRUCTION-if answer to above is NO, go to question 27	
22. File returned to C&F Agent for correction	day_ month_ hour_ min
23. C&F Agent submits corrected file	day_ month_ hour_ min
24. Customs enters data into ASYCUDA and prints corrected Bills of Export	day_ month_ hour_ min
25. File returned to C&F Agent	day_ month_ hour_ min
26. C&F Agent submits file to Revenue Officer	day_ month_ hour_ min
27. Revenue Officer approves assessment and prints Assessment Notice	day_ month_ hour_ min
28. File and Assessment Notice returned to C&F Agent (*)	day_ month_ hour_ min
29. Comment: Use this section to record any reasons for extraordinary circumstances that affected the assessment process	
<b>Section C- Payment</b>	
30. C&F Agent submits documentation to Sonali Bank (*)	day_ month_ hour_ min
31. Sonali Bank procedure - ends	day_ month_ hour_ min
32. Customs enters data into ASYCUDA	day_ month_ hour_ min

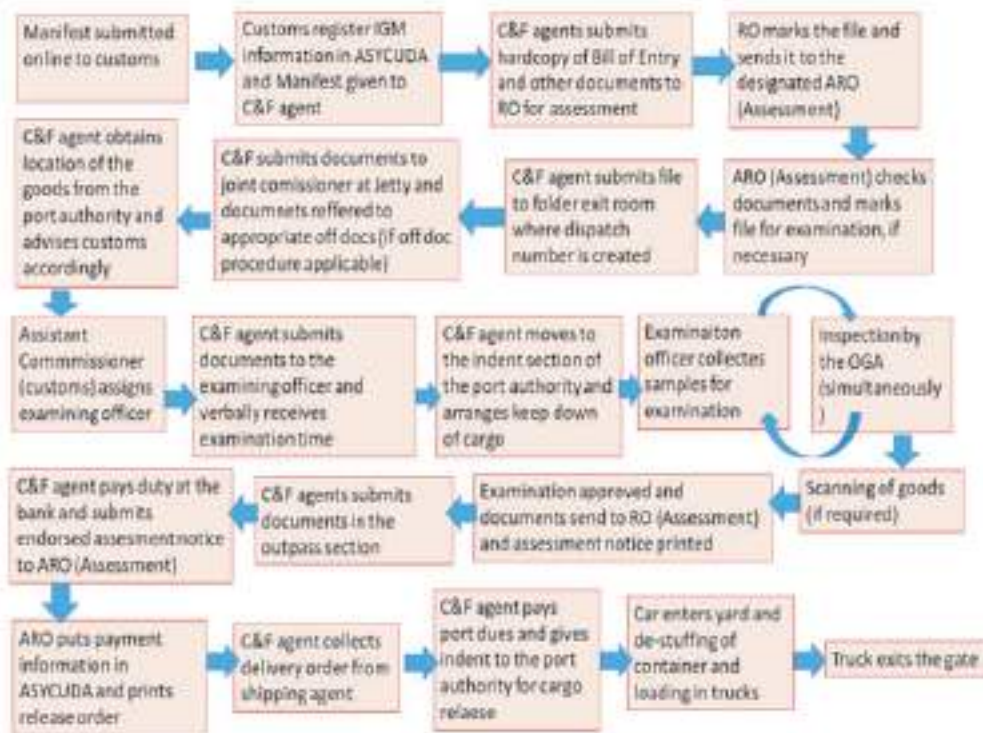
33. Release Order Printed	day_ month_ hour_ min
34. Assistant Revenue Officer reviews file and returns to C&F Agent (*)	day_ month_ hour_ min
35. COMMENTS: Use this section to record any reasons for extraordinary circumstances that affected the time taken in the payment process	
<b>Section D- Examination</b>	
36. Date and Time of arrival of consignment at export yard (*)	day_ month_ hour_ min
37. C&F Agent submits file to Revenue Officer	day_ month_ hour_ min
38. Revenue Officer assigns file to Assistant Revenue Officer	day_ month_ hour_ min
39. C&F Agent enters information into Car Pass register-commences	day_ month_ hour_ min
40. C&F Agent enters information in Car Pass register-ends	day_ month_ hour_ min
41. Examination commences	day_ month_ hour_ min
42. Discrepancies in file details detected	Yes_ No_
43. INSTRUCTION- if answer to above is NO, go to question 46	
44. Export file returned to C&F Agent for correction	day_ month_ hour_ min
45. Corrected export file returned to Assistant Revenue Officer	day_ month_ hour_ min
46. Examination-ends	day_ month_ hour_ min
47. Car Pass issued	day_ month_ hour_ min
48. File returned to C&F Agent	day_ month_ hour_ min
49. C&F Agent submits file to Revenue Officer	day_ month_ hour_ min
50. Revised Assessment Notice required	Yes_ No_
51. INSTRUCTION- answer to above is NO, go to question 58	
52. Revised Assessment Notice printed	day_ month_ hour_ min
53. Revised Assessment Notice given to C&F Agent	day_ month_ hour_ min
54. C&F Agent pays any revised assessment at bank-commences	day_ month_ hour_ min
55. C&F Agent pays revised assessment at bank-ends	day_ month_ hour_ min
56. Receipt for additional charges submitted to Customs	day_ month_ hour_ min
57. Customs enters data into ASYCUDA	day_ month_ hour_ min
58. Approved Bills of Export submitted to Assistant Commissioner	day_ month_ hour_ min
59. Assistant Commissioner approves file and returns to C&F Agent	day_ month_ hour_ min
60. COMMENTS: Use this section to record any reasons for extraordinary circumstances that affected the time taken in the examination process	
<b>Section E- Release and Export</b>	
61. C&F Agent submits Car Pass at Exit point of Bangladesh (*)	day_ month_ hour_ min
62. Gate pass issued	day_ month_ hour_ min
63. Truck exits Bangladesh (*)	day_ month_ hour_ min
64. C&F Agent enters export information in EGM register commences	day_ month_ hour_ min
65. C&F Agent enters export information in EGM register ends	day_ month_ hour_ min

66. COMMENTS: Use this section to record any reasons for extra ordinary circumstances that affected the time taken to release the goods	
<b>Additional comments</b>	
67. Have you ever faced rejection of your consignment from the importer	Yes_ No_
68. If yes, please state the reasons	
69. Have you faced rejection of any consignment on the ground of non-compliance by the domestic regulatory authorities?	Yes_ No_
70. If yes, please state the reasons	

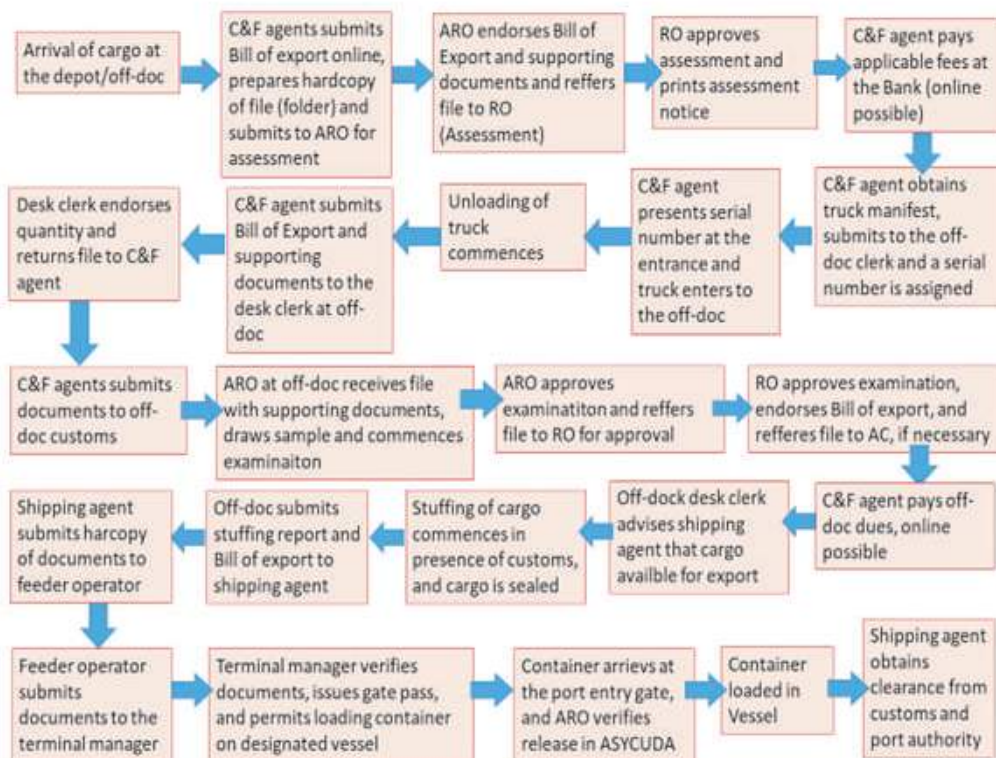


# Appendix B: The Business Process of Agricultural Commodities

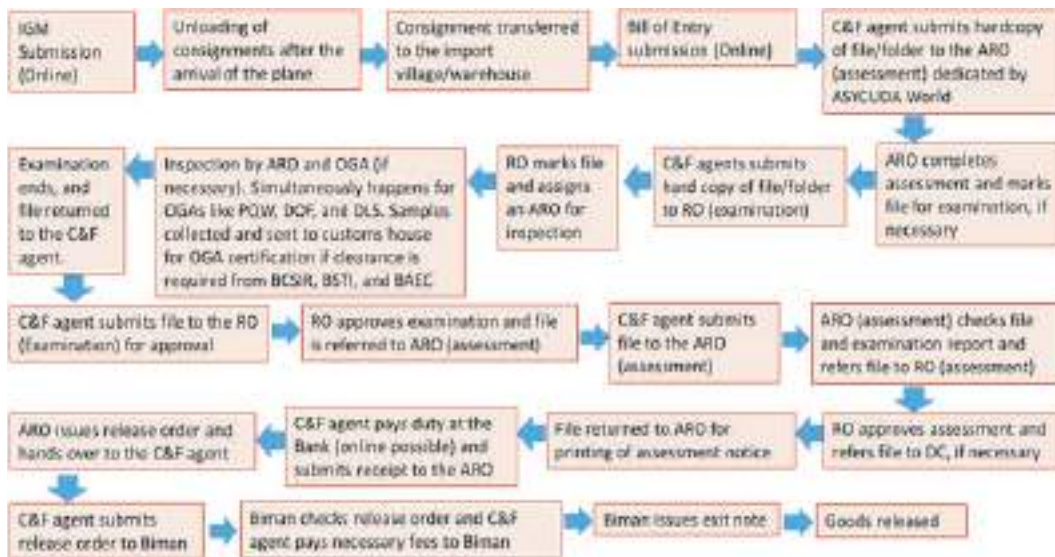
## Appendix B1: Chattogram Import Business Process Map



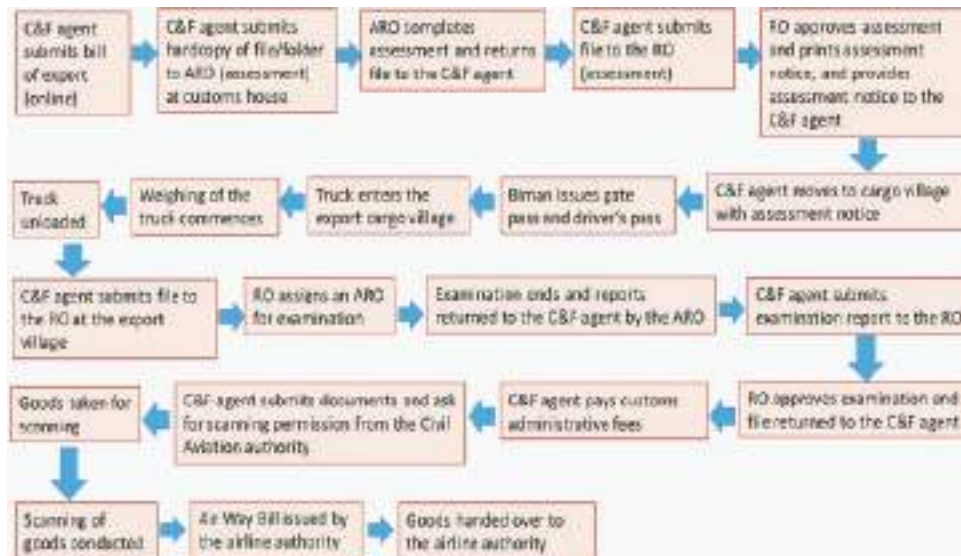
# Appendix B2: Chattogram Export Business Process Map



# Appendix B3: Dhaka Import Business Process Map

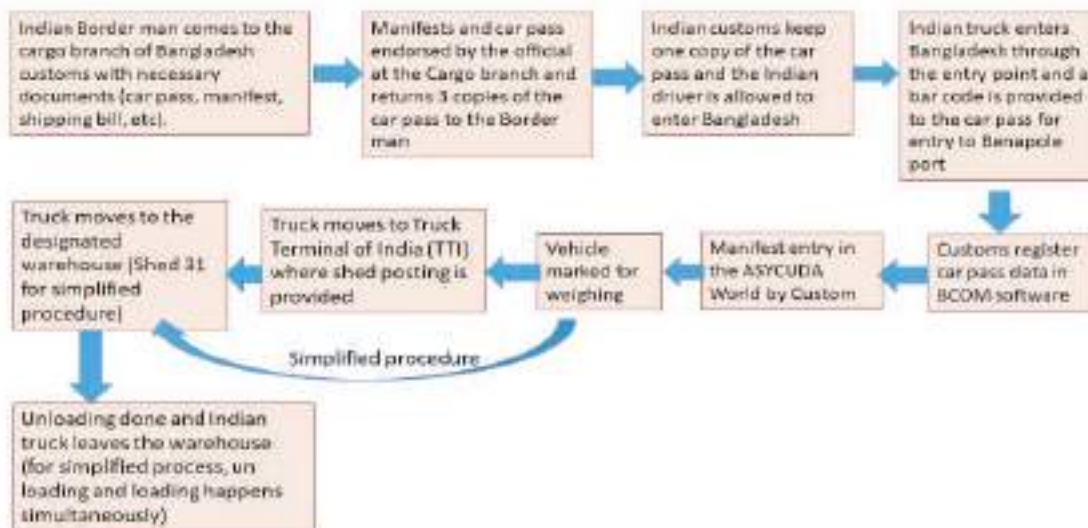


# Appendix B4: Dhaka Export Business Process Map

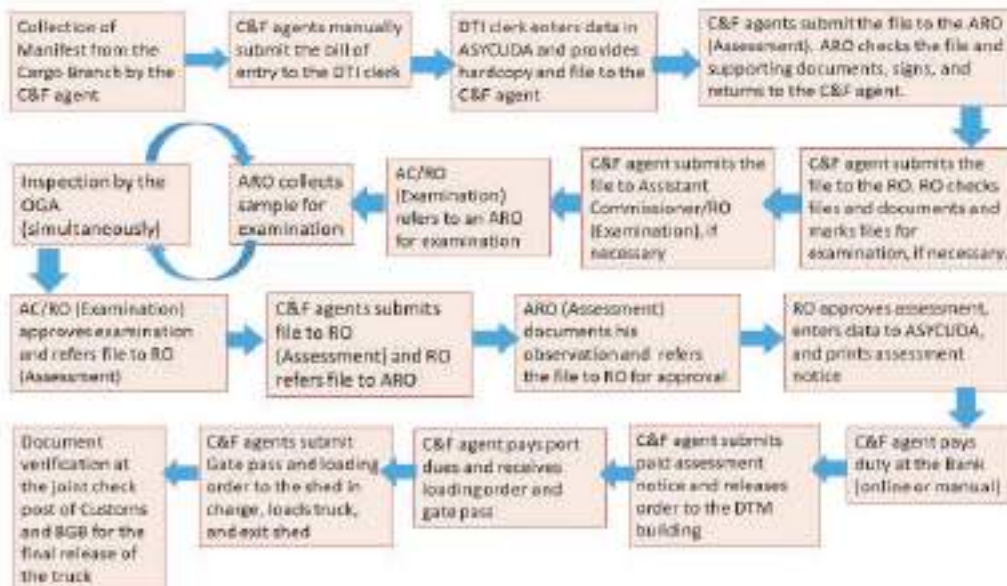


# Appendix B5: Benapole Import Business Process Map

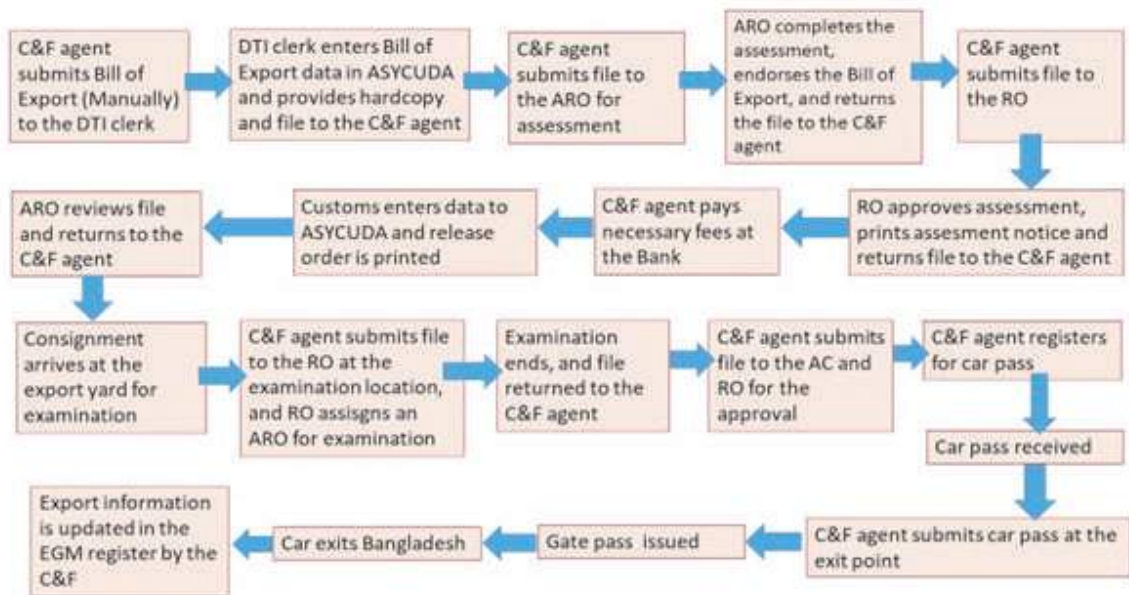
## Entry of truck to Bangladesh Border



## Assessment, Examination and Release



# Appendix B6: Benapole Export Business Process Map





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