

NATIONAL TIME RELEASE STUDY REPORT 2023



August 2024



**FIJI REVENUE AND
CUSTOMS SERVICE**



**MINISTRY
of HEALTH &
MEDICAL SERVICES**
Shaping Fiji's Health



Acknowledgement

The Fiji Revenue and Customs Service (FRCS) has successfully led its first Time Release Study (TRS) at Suva and Lautoka sea ports to measure the time taken for the release and clearance of imported goods. The TRS working group used the World Customs Organization's (WCO) TRS methodology.

Customs would like to thank the TRS Working Group team members for their engagement and commitment to undertaking this study. We also recognize the excellent cooperation by all major stakeholders in the assessed locations including Biosecurity Authority of Fiji (BAF), Fiji Ports Terminal Limited (FPTL) and Ministry of Health & Medical Services (MOH) as well as various Industry groups including Shipping Agents, Brokers, Freight Forwarders, and Importers who formed part of the working group and collected data at the ports.

Previous TRS were conducted in 2011 and 2014 by external experts. We would like to express our gratitude to the World Customs Organization (WCO) and the World Bank Group (WBG) expert teams for providing technical support in the implementation of TRS 2023, as well as for working jointly with the TRS Working Group to ensure better efficacy of the cross-border procedures and environment for cross-border trade.

Finally, we extend our thanks to everyone who in one way or the other participated in the study despite resource challenges and other factors in our virtual and physical meetings which enabled Fiji agencies to successfully undertake this task and to establish a base for future Fiji led TRS.

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Acronyms

AvRT	Average Release Time
AW	ASYCUDA World
BAF	Biosecurity Authority of Fiji
CCA	Customs-controlled Area
CP	Container Pass
CRO	Cargo Release Order
FCL	Full Container Load
FPTL	Fiji Ports Terminal Limited
FRCS	Fiji Revenue and Customs Service
HBL	House Bill of Lading
LCL	Less than Container Load
MOH	Ministry of Health & Medical Services
MWB	Master Bill of Lading
SAD	Single Administrative Document
TEU/FEU	Twenty-foot/Forty-foot Equivalent Unit
TFA	Trade Facilitation Agreement
TRS	Time Release Study
TRSWG	Time Release Study Group
WBG	World Bank Group
WCO	World Customs Organization
WTO	World Trade Organization

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Executive Summary

A time release study (TRS) is a method the World Customs Organization (WCO) developed to measure Customs performance in clearing international vessels, aircraft and cargo.

It has since been adapted to include roles for all border agencies and some aspects of the national trade logistics industry. Performance is measured based on the time it takes for cargo to be released from the port (typically Customs Release), from the time of arrival of the means of transport.

For TRS 2023, Customs commissioned a Fiji Time Release Working Group (TRWG) with guidance from the World Bank Group (WBG) team assisting the National Trade Facilitation Committee (NTFC). The study aimed to:

1. Provide an insight into the current import cargo processes at Suva and Lautoka ports during a specific time,
2. Provide accurate data from a range of border agency and industry processes to confirm the effectiveness of processes, and where necessary, identify blockages or delays that may adversely impact on timely release.
3. Make recommendations to assist improvement in the short, mid and long term, and
4. Establish a baseline for selected activities to allow comparison in future TRS.

TRS 2024 provided an opportunity for Fiji to develop an internal capability to conduct future TRS and this aim was successfully achieved.

The TRSWG designed a repeatable, paper based and systematic approach in the collection and/or processing of TRS data, to test, confirm and automate processes for utilization in future studies.

TRS outcomes are intended to be shared so the findings and experiences including innovations to the methodology and reporting, form the basis for future discussions between border agencies, industry and international support organisations such as WCO.

TRS 2023 was a developmental study. TRS are typically conducted over a specific seven (7) period at a selected port or other location. The scope usually focusses on the TRSWG agreed specific types of cargo on all vessels arriving during the period.

For TRS 2023, the working group chose to target

two specific international cargo vessels, the Captain Baret 009N and Kota Harum 5278N. The expected period for documentation and activity related to these vessels was Monday 31st May to 30th June (30 days) focusing on FCL arriving at Suva and Lautoka ports.

Survey findings included:

- A. 151 SAD were lodged for the two vessels, 67 in Lautoka and 84 in Suva.
- B. 165 FCL's were reported.
- C. The Master Manifests for both vessels, including cargo for both ports, were lodged in ASYCUDA World prior to arrival at the Suva (First Port).
- D. 96% of SAD's were lodged and released from the ports by FRCS, BAF and MoH within the 3-day free storage provided from the time of vessel alongside.
- E. 20% of SAD's were released before vessel arrival alongside, and the rest on average, 1 day and 3 hours after the arrival of the vessel.

The registration of cargo manifests by shipping companies before the arrival of the vessel (mandated by law) and the timely submission of the SAD by Customs Brokers are outcomes that can have positive impacts on the movement, handling and release of cargo.

The earlier that FRCS, BAF and MoH can analyse manifests and SAD, the better planning that can be conducted to enable improved targeting of suspect goods and the timely release of compliant goods. It may also reduce costs within the port as the Fiji Ports Terminal can take advantage of early advice from the border agencies to discharge and place cargo effectively.

TRS 2024 demonstrated that Master manifests are registered in a timely manner. There was no data collected when an additional requirement existed for the lodgement of a House Bill of Lading in AW however it is believed that this process should be improved.

FRCS has proactively engaged with brokers to undertake earlier lodgement of SAD. The data from this survey indicated 45% (Suva) and 42% (Lautoka) were lodged prior to the vessel arriving alongside. This is a good result. Further discussions with industry to identify any impediments to an increased level of pre-arrival lodgement is recommended.

It should be noted that the Master Manifest for Lautoka (second port) is lodged prior to arrival in Suva. This provides more opportunity for SAD pre arrival lodgement in Lautoka, and it is expected that this rate could be higher.

BAF and MoH have access to the Manifest and the SAD in ASYCUDA World. The survey demonstrated that there is a considerable dwell time from broker lodgement of the SAD in AW until the two agencies are aware of the lodgement. They appear to await notification of this action by the brokers.

Both agencies could seek to take further advantage of the opportunity provided by accessing the SAD directly in AW without notification from the broker. There were few physical interventions on the port premises. The BAF inspections occurred mostly outside the port, as is usual practice in most countries, so the impact of containers being released from the port was minimal.

FRCS cargo selectivity, from electronic targeting and profiles, resulted in non-intervention for 58% of cargo (Green/ Blue). This is considered low in similar international trade environments. Yellow Channel documentary checks at 36% are high. Further consideration regarding current profiles should be undertaken

BAF selected 52 SAD for further action. BAF are currently redesigning their Risk Management program and is demonstrating a desire to continually improve their intervention approach.

The key measurement for TRS 2024 is the Average Release Time (AvRT). This measures the period

between the Vessel berthing (coming alongside) at the port until the container exits the port gate. The measure is for GREEN & BLUE selected cargo and demonstrates how long it takes for cargo that is not inspected to be released, however data was collected for all types of selected channels.

Lautoka and Suva are different ports and environments and were measured separately.

AvRT – Suva: 2 days 1 hour 45 minutes.

AvRT – Lautoka: 2 days 13 hours 32 minutes

As TRS 2024 was conducted on two specific vessels, which was a different approach to TRS 2011 and TRS 2014, the AvRT are not directly comparable. However, generally the AvRT for Suva is similar to previous surveys and the Lautoka AvRT has been reduced by two (2) days.

The event data for specific activities where the border agencies conduct 'screen-based assessment and decision making' within ASYCUDA World continue to show reduction in dwell times and the ongoing effort to remove paper from the system is having a direct impact on release times.

There is evidence that brokers are sometimes required to duplicate the submission of cargo information in different electronic and/or paper processes when dealing with multiple agencies. Better use of the information provided in ASYCUDA World by all agencies would benefit traders. The capacity already exists in the current system for duplication to be removed, however it is recognised that in the longer-term other agencies would require connectivity to their own systems.



SECTION ONE: SETTING THE SCENE

Introduction

Customs, Biosecurity and Health / Food safety security are important parts of government responsibilities. Undertaking this task is a significant activity that impacts on trade across international borders. It is important that border agencies maintain an effective cargo clearance regime that identifies and deals with risk goods while also facilitating compliant importers.

A time release study (TRS) is a method endorsed by the World Customs Organization (WCO) to measure customs and other border administrations performance in clearing cargo via a standardised process. Performance is measured based on the time it takes for a container to be released from the time of the vessel's arrival until it exits from the port gate. A TRS measures FRCS, BAF and MoH's contribution and commitment to trade facilitation which benefits and grows the economy.

It also measures processes that are the responsibility of industry including lodgement of manifest and cargo declarations, discharge and container handling and helps identify blockages throughout the entire process.

It is recognized that some delays are caused by lack of infrastructure, and it should be noted that some improvements cannot be achieved despite the will of the agencies and industry without major infrastructure building.

TRS 2023 Intentions.

The intent of TRS 2023 was to:

- update baseline measures previously used in 2011 / 2014 that measure the performance of Customs and other border regulatory clearing processes and
- provide measurement for current cargo clearance procedures to enable future comparison as Fiji embarks on a program to improve its trade facilitation processes.

Aims and objectives.

- The specific aims and objectives of the study were to:
- Test the progress of the ongoing change program to provide simplified and harmonized clearance procedures by collecting data on FRCS, BAF and MOH clearance times and the physical movement of cargo across the border.
- Identify and confirm the need to develop inno-

vative approaches including automation where possible.

- Provide information for ongoing discussions between border agencies and industry groups.
- Establish an updated baseline dataset to measure and benchmark Customs performance in trade facilitation.
- Share the findings with external audiences where appropriate.

Methodology

The methodology for TRS 2023 followed the WCO guide to Measure the Time Required for the Release of Goods Version 3, 2018 and adapted to local conditions, cargo volumes, and flows.

Phase One involved planning and preparation including a test run, It included:

- Establishment of a TRS Working Group (TRSWG) including the Border Agency's and key industry participants, with some support from the World Bank to co-ordinate the TRS 2023 implementation.
- Engagement with port companies to examine current procedures through the supply chain and ensure correct 'events' are measured.
- Planning the collection of data and conducting a trial collection (March 2023) to verify/validate.

Phase Two included:

- Finalisation of planning and agreement on final survey questions, deciding the scope of the survey, and developing a timeline for TRS 2023.

Phase Three included conducting TRS 2023 by,

- Collecting of data from various sources
- Checking, merging and inputting various datasets in WCO TRS system
- Analysis of the data, and
- Publication of the report.

Scope of the study

Cargo scope: It was agreed that the study would focus on two vessels that arrived and discharged cargo at both Suva and Lautoka ports on single transit voyages. This would enable comparison of key processes, test national consistency and test the single manifest lodgement process for arriving vessels. Two vessels were selected within the timeline and the survey was restricted to FCL cargo.

Sea cargo: Data on containerised cargo (FCL) was sourced from port companies where the selected container vessel discharged cargo at Suva and Lautoka.

Exclusions: Other vessels arrived during the survey period however they were not included in the survey. The study primarily examines Customs, Biosecurity, Ministry of Health & Medical Services and Fiji Port Terminal Limited's role in dealing with cargo until it exits the port gate. Other border agencies apart from Biosecurity, MOH and FPTL who may also be involved in the clearance of cargo at the border but were not included. The application and approval processes for import permits prior to importation of cargo was not included.

SAD type: Only cargo that was declared and cleared by a Customs import entry through AW was included in the study. Clearance by other types or methods were excluded.

AW SAD Description: An SAD is an import and transshipment entry (declarations) lodged electronically by Customs brokers and / or importers for individual cargo consignments. Border agencies use SAD for profiling of the cargo and assessment. Within Customs the profiling and assessment activity occurs within AW and includes business rules, alerts, and risk assessment processes. The SAD is then rejected or accepted. Once validated the SAD is cleared. Only a cleared SAD's can generate an electronic Cargo Release Order (CRO). This is the time that Customs 'releases' the entry and cargo. The CRO authorizes the Customs delivery of imports from the port (Gate out) or loading of transshipped onto the vessel or aircraft.

Time stamps are electronically recorded and saved to a database for AW lodged SAD. The required information including times was later extracted from the AW database. If an SAD is adjusted/modified an updated version is created and that version becomes the current version.

Legislation: The 'Customs Act 1986' and the 'Customs Regulations 1986' set out the legal requirements in respect to imported and exported goods. Part 7 of the Customs Act specifies the time at which entry of goods applies for imports. In the case of goods imported by sea or air, the entry must be made before the date on which the goods are imported or within 21 working days after the date of importation.

An entry is deemed to have been passed when a CRO message is generated by Customs.

Part 7(30A) specifies the conditions for entry of goods. Section 37 -56 of the Customs Act allows imported goods to be warehouse under bond under and must be cleared 24 Months from the date of importation. The Comptroller has the power to proceed with the sale of goods if it is not cleared within the abovementioned timeframe.

Other data sources: Customs systems do not record details or times for all events in the importation of cargo. Data was therefore sourced from other parties.

Port companies provided the vessels details, times, discharge lists and gate out times recorded in Port systems when containers exited the port.

Manifest and arrival data was sourced from AW after it was reported by the shipping agents and cargo carriers. These additional times provide a more complete picture of the cargo clearance process.

Key measures

The primary TRS measure is: The arithmetic means and/or median time between the arrival of the goods and their release into the economy.

Mean (average) and median (middle) times were calculated. Presenting both times helps to provide a better understanding of the movement of cargo and clearance process. A large outlier can have a significant impact on the average time, but less so on the median time. Other statistical measures reported include minimum and maximum values, and ranges.

Release verses Clearance terminology. This study collected and analysed Customs data up to when Customs 'clears' the entry and 'releases' import cargo for delivery. For FRCS the release and clearance are the same.

For BAF the study collected BAF data up until the 'Cargo Hold was removed' allowing the container to leave the port, either as free cargo or for 'off port' inspection. This information is part of the Average Release Time. However, BAF data was also recorded for 'off port activity and this is reported for consideration to assist BAF and traders to understand impact throughout the entire process.

Date range: The survey period chosen for the study was: Saturday 03 June to Monday 12 June 2023 (the dates of arrival of the two selected vessels). However, the actual data collection period spanned from initial manifest submission 31 May 2023 before the actual arrival of the first vessel in Suva and

continued until 30 June 2023 when the last SAD was released for both vessels.

For the calculations of the measures the times are in Fiji standard time.

In addition to measuring clearance times, the report contains recommendations to improve performance and lays a foundation that enables improved future change program decision making and implementation.

Proposed ongoing changes that will have impact on improved border efficiency and effectiveness include:

- implementation of the new Customs Regulations where relevant, to provide the framework for any future improvements

- further simplification of border clearance procedures (acceptance of electronic documents by all border agencies, full operationalisation of the NSW and ACI, reduce duplication of documents).
- further enhanced engagement with clients and provision of transparency through Client Survey to gauge stakeholder expectations in terms of future clearance and release times and e-commerce and openness about transactions.
- developed and enhanced border risk management – ensuring all transactions are subject to automated risk-based controls, establishment of a National Targeting Centre, and implementation of simplified clearance procedures for approved traders.

SECTION TWO: ANALYSIS OF DATA

Key data

Table 1 (below) indicates the Average Time Interval for each key event. (Note – Averages for events marked** are not directly comparable between ports due to the lodgement of the Master Manifest occurring prior to first port arrival in Suva.

Table 1

Event	Description	Suva	Lautoka
Average Release Time (AvRT)	Vessel alongside (11) to Exit Port (59) All SAD Green & Blue selectivity only	2d 16h 24m 2d 1h 45m	2d 15h 21m 2d 13h 32m
Registration of Master Manifest** <i>Risk Management Opportunity</i>	Master Manifest lodged by Shipping Agent (8) until Vessel alongside (11) <i>(Lodged for all Fiji cargo prior to arrival at First Port - Suva)</i>	3d 9h 40m 100% prior to arrival.	4d 22h 46 100% prior to arrival
Registration of SAD <i>Risk Management Opportunity</i>	Master Manifest received by AW (8) until SAD Registered by Broker (16)	3d 16h 23m	5d 18h 44m
Registration of SAD <i>Risk Management Opportunity</i>	Vessel Alongside (11) to SAD Validation and Assess (16)	55% 1d 17h 18m. 45% Lodged prior to alongside	58% 2d 15h 31m. 42% Lodged prior to alongside
Discharge Time	Vessel alongside (11) until Commence Discharge (12)	0d 1h 11m	0d 2h 35m
	Vessel alongside (11) until End Discharge (13)	0d 6h 31m	0d 14h 54m
	Discharge Period (12-13)	0d 5h 20m	0d 12h 20m
Payment	SAD Validation and Assess (16) to SAD Payment (17). All SAD Green and Blue Selectivity only Discharge Period (12-13)	0d 17h 36m 0d 9h 26m	0d 10h 14m 0d 9h 46m

Customs Clearance Processing	SAD validation (16) to Customs Generate Release (29). All SAD Green and Blue Selectivity Only	1d 4h 35m 0d 23h 53M	0d 21h 48m 1d 6h 21m
BAF Clearance Processing – On Port – Nil Inspection	SAD Validation (16) to BAF Delivery Order (45)	1d 23h 18m	1d 22h 55m
BAF – Agent Notifies SAD to BAF	SAD Validation (16) to Broker notifies BAF at port (30). (Outside of AW process)	1d 0h 32m	1d 21h 14m
BAF – Start to Assess SAD	Broker Notifies SAD (30) to BAF start Assess of SAD (31)	0d 1h 9m	Nil Records
BAF – SAD Assessment	BAF start Assess SAD (31) to Re-route of SAD in AW (32)	0d 0h 9m	Nil Records
MOH Clearance – SAD Validation to Clearance	SAD Validation (16) to Clearance by MOH (55)	3d 05h 24m	Nil Activity
MOH Clearance – SAD Validation to Broker SAD Notification to MOH	SAD Validation (16) to Broker notify SAD to MOH (47)	2d 12h 21m	Nil Activity
MOH Clearance - Agent SAD Notification to Clearance	SAD Notification (47) to Clearance by MOH (55)	0d 17h 3m	Nil Records
Dwell Time- Port receives Customs and BAF releases	AW Generate Custom release order (56) to BAF release Hold to Port (57)	0d 2h 19m	0d 2h 59m
Port Generates Release order	Port received BAF release (57) to Generation of Port Release (58)	0d 1h 20m	0d 0h 54m
Release order to Gate Out	Generation of Release order (58) to Gate out (59)	0d 13h 9m	0d 9h 36m
BAF off-port inspection	Gate Out (59) to BAF start inspection (69)	1d 13h 52m	1d 0h 4 m

Snapshot of key events

Time Release Study (TRS) measures a snapshot of time between pre-determined 'events. For this TRS ten (10) events were measured, namely:

- A. Arrival
- B. Offload
- C. SAD registration
- D. X-ray procedures
- E. Regulatory & Compliance
- F. SAD payment
- G. Agency Release (by Agency)
- H. Exit note
- I. Wharf to Gate (Average Release Time)
- J. Offload to Gate

The first two (2) events (Arrival & Offload) are the sole domain of the FPTL. The further six (6) events [X-Ray, Regulatory and Compliance, Agency Release, Payment, Arrival to Gate and Offload to Gate, measure various elements of the cargo clearance process related to the work undertaken by the regulatory agencies, logistics operators, and the Customs Brokers and Importers.

Finally, two (2) events (Preparation and Release) are the sole domain of the Customs Brokers and Importers and logistics operators.

'Dwell Time'. This metric measures how long the cargo and/or documents relating to a specific consignment remain in the various work areas prior to moving to the next. This metric identifies areas where savings can be made when linked to the implementation of process improvement and/or technology.

This section presents graphs and tables derived from the survey data entered to the WCO Online TRS System. The TRS survey form with data collection (measurement points) can be found in Appendix 2.

The Average Elapsed Times noted within this report is the measurement between two points whereas the Average Release Time is measured from the time 'Vessel is Alongside Wharf' to 'Gate Out' (consignments exits the Port Gate).

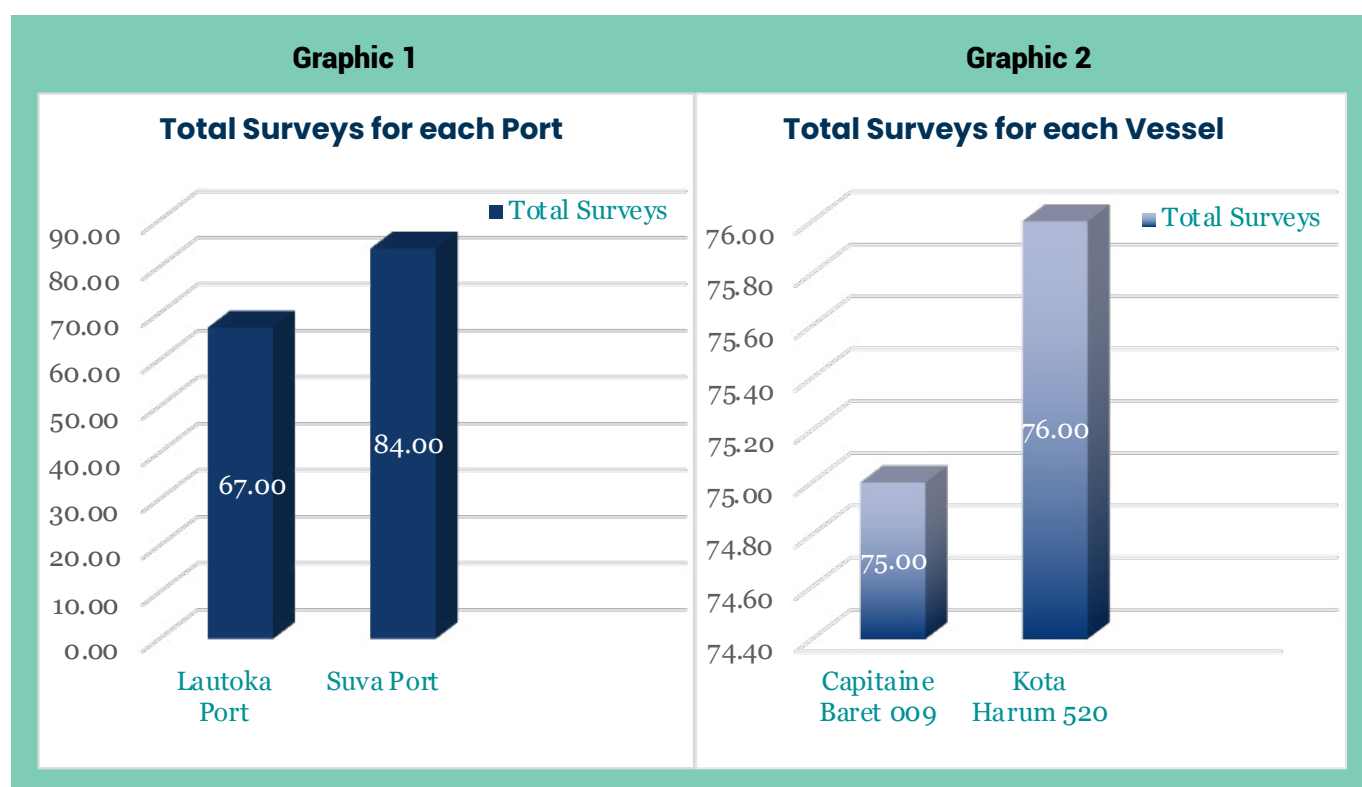
The following information provides identified snapshots of events. It provides information regarding positive outcomes or identified blockages and highlights issues for future consideration.

Table 2.

Four Key events and times – TRS 2023				
Mode	Average Release Time	Registration of SAD (after alongside)	Clearance Process FRCS & BAF (after SAD registration)	Physical Release
Suva	2d 1h 45m	55% 1d 17h 18m 45% prior to alongside	1d 23h 18m	0d 1h 20m
Lautoka	2d 13h 32m	58% 2d 15h 31m 42% prior to alongside	1d 22h 55m	0d 0h 54m

Vessels (Selected for Survey 31 May -30 June 2023).

1. CAPITAINE BARET V009N.
2. KOTA HARUM V520S.



Survey forms.

There was a very good return rate for the survey.

Table 3.

Sea Cargo: Key Events and Measurements – Survey Forms completed		
Vessel	Lautoka Port	Suva Port
CAPITAINE BARET V009N	40 Surveys	35 Surveys
KOTA HARUM V520S	27 Surveys	49 Surveys

Average Release Time by Percentages.

The following table shows the release time for SAD in 10% intervals. Note: It is the time for the last SAD in each 10% range).

Suva			Lautoka		
%	minutes	h m d	%	minutes	h m d
10	1488	1d 0h 48m	10	1820	1d 6h 20m
20	2360	1d 15h 20m	20	1844	1d 6h 44m
30	2400	1d 16h 0m	30	1844	1d 6h 44m
40	2469	1d 17h 9m	40	1885	1d 7h 25m
50	3043	2d 2h 43m	50	2138	1d 11h 37m
50	2985	2d 1h 45m	60	3625	2d 12h 25m
60	3553	2d 11h 13m	67	3694	2d 13h 33m
70	3595	2d 11h 55m	70	6714	4d 15h 54m
80	3668	2d 13h 8m	80	6735	4d 16h 15m
90	4115	2d 20h 35m	90	6805	4d 17h 25m
100	5020	3d 11h 40m	100	6959	4d 19h 59m

Data from 151 import SAD (165 FCL containers) was sourced to analyse the release and movement of cargo. The mean Average Release Time (AvRT) for FCL's with nil FRCS intervention was 2 days 1 hour 45 minutes (2.06 days) for Suva and 2 days 13 hours 33 minutes (2.55 days) for Lautoka. These are reasonable timeframes considering the current varying level of electronic processing capability within the border agencies and compare favourably with Pacific Island counterparts.

Manifests and SAD Lodgement.

The initial data provided to the border agencies to start the risk targeting and assessment processes is the lodgement and registration of the Master Manifest by the Shipping Company. During the survey all the Master Manifests were lodged prior to the arrival of the vessels at the first Port (Suva), and this is the required standard.

Border agency final assessments (and subsequent decisions to release, inspect etc) for individual FCL

does not commence until the SAD (entry declaration and accompanying documents) are lodged within ASYCUDA World by the Customs Broker / Importer.

Thier lodgement of the SAD is dependent on actions taken by industry. However, the Customs Broker cannot lodge an SAD in instances where a House Bill of Lading (HBL) is required until the HBL has been lodged to support the manifest. The times for lodgement of the HBL was not measured in the survey however anecdotally it is accepted that the input of some HBL is not timely. This delay can cause delays in SAD lodgement.

The following Table (table 6) demonstrates that Master Manifests are being lodged in advance of the vessel arrival at first port. This timeframe provides ample opportunity for the House Bill of Ladings to be input by shipping companies / freight forwarders prior to vessel alongside.

Table 6

Event	Description	Suva	Lautoka
Registration of Master Manifest. Provides Opportunity for companies to lodge House Bill of Lading	Master Manifest lodged by Shipping Agent (8) PRIOR to Vessel alongside (11) <i>(Lodged for all Fiji cargo prior to arrival at First Port - Suva)</i>	3d 9h 40m 100% prior to arrival.	4d 22h 46 100% prior to arrival

It is internationally considered best practice for most SAD to be lodged prior to the vessel going alongside. This allows decisions to be made regarding discharge locations, improved planning for inspections etc. and provides more certainty for traders. During this survey 45% of SAD were lodged in Suva and 42% were lodged in Lautoka prior to alongside. This means that the remainder were lodged 1.7 days and 2.6 days in Suva and Lautoka respectively, after vessel alongside in each port.

For Lautoka, this requires further investigation as the Master manifest is lodged prior to arrival in Suva, therefore there is significant extra time available to input the SAD in Lautoka as the vessel is alongside in Suva and then transits to Lautoka providing increased opportunity for brokers. It is noted in one instance that the SAD was lodged 7.5 days after the arrival of the vessel. These times can have an impact on the average.

Discharge of Containers.

The unloading of containers commences soon after the vessel goes alongside the berth and other formalities, including biosecurity, are completed.

During the survey, the earliest container unloaded was 55 minutes after arrival (Suva), while the last container was discharged from the vessel 8 hours and 52 minutes after arrival. On average FCLs (all selectivity) remained in Suva port for 2 days and 16 hours and 24 minutes after arrival and in Lautoka Port for 2 days 15 hours 21 minutes. The quickest 'SAD assessment to exit gate' was 14 hours in Suva which demonstrates the quick release times when SAD are lodged early and there is minimal intervention by the border agencies.

No FCL remained undelivered at the end of the data collection period.

LCL cargo is different to FCL cargo and was not included in this study. However, the customs processes for reporting the cargo are the same and the port processes are also similar for both Vessels. It would be expected that LCL would take longer than FCL in many cases as there is a heavy reliance on House Bill of Lading and as noted in the study, the

timely lodgement of House Bill of Lading is an issue for further consideration.

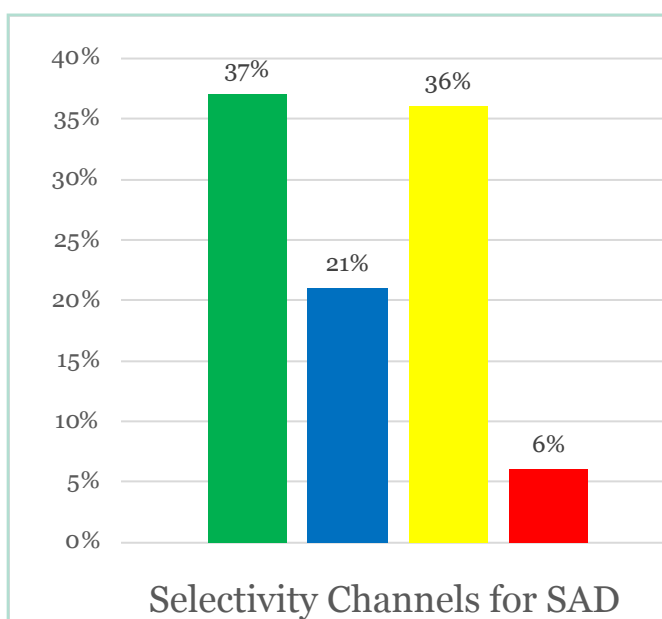
This study found, 94% of SAD for FCL cargoes are released within the 3 days free storage time for both ports which reduces costs to traders.

Border Agency ON Port Procedures

The Average Release times (see Table 2) in Lautoka were on average 12 hours longer than Suva. However, the average time for an SAD to be assessed and released by the combined agencies is similar in both ports (averaging 1.95 days). The pre-arrival SAD lodgment rate is also similar (averaging 56.5%).

The data indicates that the combined FRCS and BAF procedures take similar times in both ports. This raises the question as to why the average release time is much greater in Lautoka. The most likely reason is the combined effect of the longer discharge times in Lautoka and the because the Customs Brokers take 12 hours longer to lodge the SAD in Lautoka than in Suva. As noted earlier, further investigation into improving the opportunities to lodge SAD in a timelier manner in Lautoka should be undertaken.

Graphic 3 SAD Selectivity.



The FRCS clearance process for SAD's (noting there were no physical X-Ray interventions on port for these two vessels) is standard and is electronically based in ASYCUDA World.

The BAF procedures appear to differ in both ports. Suva Port BAF activity was recorded in ASYCUDA World and indicated there were 20 instances where the period from the commencement of the documentary check by BAF until the issue of the delivery order was 19 hours and 20 minutes. This information is not recorded for Lautoka.

The requirements to obtain clearance for SAD where there is a BAF risk include the following activities.

1. Lodgement of SAD by Customs Broker (this is the Customs SAD)
2. Notification to BAF that SAD has been lodged.
3. Documentary Check by BAF and decision to re-release or inspect (including where)
4. Release (Either goods are fully released or re-released to the owner premises or similar for later inspection).

Table 7

Event	Description	Suva	Lautoka
BAF Clearance Processing – ON PORT – Nil Inspection	SAD Validation (16) to BAF Delivery Order (45)	1d 23h 18m	1d 22h 55m
BAF – Agent Notifies SAD to BAF	SAD Validation (16) to Broker notifies BAF at port (30). (Outside of AW process)	1d 0h 32m	1d 21h 14m
BAF – Start to Assess SAD	Broker Notifies SAD (30) to BAF start Assess of SAD (31)	0d 1h 9m	Nil Records
BAF – SAD Assessment	BAF start Assess SAD (31) to Re-route of SAD in AW (32)	0d 0h 9m	Nil Records

The data above indicates in Suva and Lautoka that there is a delay from lodgement and validation of the SAD until the Customs Broker notifies BAF of lodgement. This is usually one day in Suva and almost two days in Lautoka. There is then a one-hour delay in Suva (nil records in Lautoka) until assessment of the SAD commences. Assessment of the SAD then takes nine minutes in Suva (nil records in Lautoka).

BAF has access to the SAD when it is lodged and validated in ASYCUDA. The study does not indicate the reason for the requirements for the Customs broker to notify BAF of the lodgement of the SAD and there may be valid reason for this action. Further consideration by BAF of their current On Port

clearance processes should be considered as the data indicates there is opportunity to substantially reduce the release times for this activity.

Border Agency OFF Port activity.

Most BAF consignment inspections occur OFF port due to the need to maintain the product quality and/or ensure an effective inspection.

The containers selected for OFF port inspection are included in the average release time for FCL exiting the port. The later dwell times awaiting inspection, the inspection and any subsequent treatment requirements are not included in the average release time. Table 8 indicates dwell times for exit from the port until inspection commences.

Table 8

Event	Description	Suva	Lautoka
Port Generates Release order	Port received BAF release (57) to Generation of Port Release (58)	0d 1h 20m	0d 0h 54m
Release order to Gate Out	Generation of Release order (58) to Gate out (59)	0d 13h 9m	0d 9h 36m
BAF off-port inspection	Gate Out to BAF start inspection	1d 13h 52m	1d 0h 4 m

The above dwell times for the removal of the container from the port after BAF release (either for re-release full release or for release to premises for inspection), and the 'gate out' to 'start inspection' are affected by payment of fees to FPTL, availability of transport, timing of the Customs brokers requests to move and inspect, and availability of inspectors.

The dwell times are reasonable by international standards however a specific discussion between industry and border agencies would establish if there were any blockages due to poor communication, lack of access to approve movements in border or industry systems, or poor planning.



Origin of Survey Cargo: Top 5 overseas country of loading

During the TRS survey, containers were shipped (based on port of loading) from various countries. Five countries of origin accounted for 135 FCLs (90%) of the 165 containers discharged at both ports. Imports from China recorded highest containers followed by New Zealand and Australia. It is noted that the survey focused on two specific vessels so the table showing countries of origin should be read in that context, however ASYCUDA World statistics reveal this is a typical example for most vessels. Weekly statistics can vary change depending on different vessels and routes.

Import SAD for containers loaded in Australia and New Zealand were released on average at 2 days 4 hours across both ports which is lower than the overall rate. This reflects the earlier lodgement of SAD's by the Customs brokers for goods originating in these countries. Further considerations of the reasons for this

Table 9

Loading by Country of Origin for Imports		
Country	Vessels	Number of FCL's
New Zealand	2	36
Australia	2	12
Malaysia	2	8
Hong Kong	2	15
China	2	64
Other	2	30

would be worthwhile as it may indicate an issue with receipt of timely documentations from other countries or it may simply represent exporters from those countries are more experienced in dealing with Fiji requirements.

Note regarding SAD lodgement times. Cargo information is initially entered into the SAD on ASYCUDA World by the Customs broker. When completed an SAD registration number is created and the time recorded. Every time an SAD is amended and updated, a new version is created and a new time recorded. For most entries in this data, it is the original time that is used to calculate the TRS measures. However, for some SAD, other versions were created, and the new times are used. This is not an issue for the study as the time recorded is the time the Customs broker has finally recorded the correct data and made the final declaration.

SECTION THREE: OBSERVATIONS AND RECOMMENDATIONS

Observations

The 2023 study achieved its aims and objectives and provides an updated set of baselines TRS measures. Customs, as the lead agency for the TRS activity, should look to utilise the findings and engage with Fijian businesses and other interested stakeholders, and other border agencies to provide feedback and to consider the recommendations in the report.

The data confirms that Customs has developed effective processes to facilitate the clearance of cargo and there is minimal impediment to delivery of cargo that is reported correctly. Many processes include electronic reporting and automated or screen-based review. There is a demonstrated use of business rules, risk management and risk alerts system, deferred payment schemes, post-entry auditing capability, and on-going engagement with the importers and industry players at all levels in the supply chain.

The Intervention rate for the study indicated a high intervention rate (Yellow) and this should be reviewed to establish if it was consistent with the normal patterns or simply an aberration during the survey. A further review of the risk profiles in ASYCUDA World is recommended for the action plan (see recommendations).

Although not directly comparable, the measures and results from this study do compare favourably with the measures and results from the earlier studies. This does not mean that there are not further opportunities for improvement and ongoing engagement and review with all participants in the supply chain are vital.

One objective of the study was the need to verify the use of the electronic systems that had previously been a manual and time-consuming process, and to seek information regarding opportunities to further automate the process.

It was noted during the exercise that the border agencies and industry co-operative approach to improve the use of electronic manifests has been successful. Further opportunities exist for a similar co-operative approach to fully identify the cause of the delays in submission of the House Bill of Lading, increased level of pre-arrival processing and movement of containers.

FRCS has effective electronic systems however the study does underscore the need for BAF and MOH to have improved electronic capabilities. BAF are undertaking a significant change program and risk management, profiling and data exchange are developing. While awaiting new IT infrastructure development there are also opportunities to improve

the electronic management of import documents within the current systems in place,

This TRS serves as a test bed for the Fiji agencies to undertake the first TRS under their own efforts and it is noted that decisions were made to ensure objectives. Future TRS will be based on the full WCO model.

It is recommended that the next TRS should be undertaken only after the TRSWG has engaged with agencies and industry to fully consider the findings of this report and to seek solutions. Some outcomes can occur in the short term however it should be noted that some improvements require infrastructure changes that cannot occur quickly, and it should be recognised that these 'blockages' may exist for a long time.

The TRSWG believes it is necessary to conduct similar processes within the Air cargo environment. However significant work is required to plan and execute an air cargo TRS. It is important that a full understanding of the issues in this environment is considered before attempting a TRS.

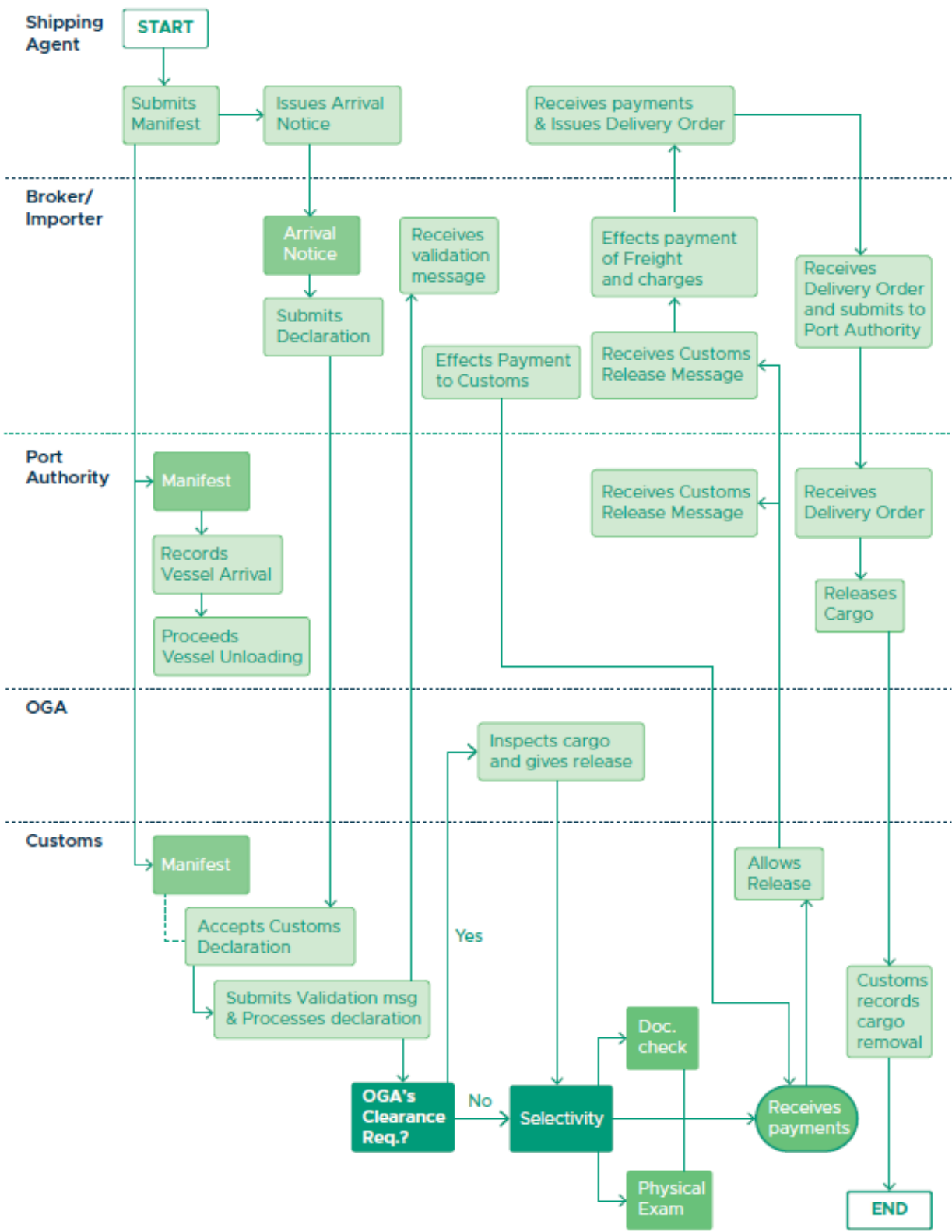
Recommendations.

The following recommendations are made.

1. A summary of the outcomes of this report be provided at the next National Trade Facilitation Committee (NTFC) meeting.
2. An action plan be prepared by the TRSWG to consider the next steps to develop tasks and assign responsibility and implementation timelines from the recommendations.
3. As per the current NTFC working group model, small working groups with key experts from participating agencies/industry, be established for each of the identified specific issues. Working groups should not be ongoing and should be assigned set timeframes and be tasked to assess the issue and suggest solutions. Recommended tasks include.
 - a. Consider the issue of delayed submission of House Bill of Lading adversely impacting on opportunities to submit SAD's in a timely manner.
 - b. Customs to engage with Customs brokers to encourage increased uptake of pre -arrival processing (partially related to a.) Particular attention to be given to the lost opportunity for cargo arriving at second ports (in the study case it was Lautoka) to greatly increase pre arrival processing.
 - c. BAF to review their SAD management process to take advantage of ASYCUDA World current capability, while acknowledging a longer-term option to develop a BAF IT system within the eNSW, remove dual systems and standardise the approach in Suva and Lautoka.
 - d. MOH to review their process for preapprovals of products for human consumption and submission of samples for their health risk assessment, responses from importers on queries raised, the nature of the product are having dwell times for release approvals. Furthermore, more awareness to be raised to the stakeholders for MOH requirements for food product imports.
 - e. ASYCUDA World can be used to develop monthly Management reports that can measure some of the key events recorded in the TRS to ensure improvement is maintained and to reduce the need to rely on full TRS as these are resource intensive and should be restricted to every 2 or 3 years for each location or environment
4. FRCS review current risk profiles in ASYCUDA World and consider update based on Yellow/Red intervention results. Consider current risk and establish current reasons for high intervention rate to check effectiveness.
5. The full report or a summary of the report, including the Average Release Times for both ports, should be published as per TFA and WCO requirements.

APPENDICES

APPENDIX: A Model for seaport Cargo process



APPENDIX B: TRS WORKING GROUP

Participating Agency	Name of the representative
Fiji Revenue and Customs Service (FRCS)	Suva Port Nausad Ali, Sharmila Sharma, Sharda Naidu, Robeen Chand, Nikita Virani, Meli T. Serunituacoko, Lautoka Port Rajneesh Nand, Preethi P. Prasad; Sotiana L. Takirua; Napoli- oni Q. Likuveiqali, Anshu S. Mudaliar
Biosecurity Authority of Fiji (BAF)	Suva Port Kritesh Sharma, Nafiza Bibi, Mohammed Ifraaz Lautoka Port Nilesh Chandra,
Fiji Ports Terminal Limited (FPTL)	Emosi Tolovatu, Taniela Bale
Ministry of Health & Medical Services	Suva Port Sanjeet Prasad, Sanjeshni Devi, Salaseini Yaluyalulala Lautoka Port Ashmita Kumar, Wilson Singh

APPENDIX C: Customs Selectivity on Surveyed vessels

Vessel	Selectivity Channel	Count of TRS NUMBER	Count of SAD #
Capt Baret	Blue	23	23
	Green	29	29
	Red	6	6
	Yellow	25	25
Kota Harum	Blue	9	9
	Blue	2	2
	Green	28	28
	Red	4	4
	Yellow	31	31
Grand Total		157	157

APPENDIX D: TRS Questionnaire for Sea Cargo

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Chief Executive Officer
Fiji Revenue and Customs
Service

23/09/2024

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Chief Executive Officer
Biosecurity Authority of Fiji

23/09/2024

.....

Permanent Secretary
Ministry of Health and
Medical Services

23/09/2024

.....

Chief Executive Officer
Fiji Ports Terminal Limited

23/09/2024

NATIONAL TIME RELEASE STUDY REPORT 2023



August 2024



**FIJI REVENUE AND
CUSTOMS SERVICE**



MINISTRY
of **HEALTH &
MEDICAL SERVICES**
Shaping Fiji's Health

