

Sharing Bangladesh Experience to Conduct TRS: Addressing the Effectiveness and Bottlenecks

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! TRS: What it is!

- The TRS is Method accredited by the WCO for assessing a country's trade facilitation performance at borders. The TRS primarily measures the average time between the arrival of goods at the border and their release through a regulated clearance process.
- Article 7.6 of the WTO Trade Facilitation Agreement (TFA) stipulates that “Members are encouraged to measure and publish their average release time of goods periodically and in a consistent manner, using tools such as, inter alia, the Time Release Study of the Worlds Customs Organization”.
- TRS has also been helpful for periodic monitoring and evaluating the outcomes of implementing specific associated measures, policies and programmes.

How to Measure Effectiveness

- Before discussing effectiveness, we need to eye what were the recommendations made from each of the TRS and what are measures taken to implement the recommendations and finally how the measures are functioning.
- To measure the effectiveness, we need to outline and pinpoint what were the recommendations made by each TRS.
- The stations where TRS were conducted, the methodology, sampling, time and other parameters worth cognizable at the time of the TRS were separate and distinct for each of the TRSs.

Recommendations of TRS-1

- **TRS-1 (2014):** It covered two of our biggest Customs Houses; for sea born cargo, we chose Chittagong Customs House, the gate way of Bangladesh which administered almost 82% of the total cargo we handled in Bangladesh; and for truck laden cargo, we chose Customs House Benaple, the largest Land Customs Station of Bangladesh.
- IFC (World Bank) financed the TRS; IFC had appointed OrQuest Research Limited for data collection, analysis and some other activities. Bangladesh Customs, C&F Agents, Port Authority had actively participated the TRS. However, the recommendations were:

CCH:

- A paperless system should be developed for the Customs procedures; this system not only save time but also corruptions. The recommendation is yet to implement. National Single Window (NSW) project has already piloted for 6 CLPAs out of 39. Hopefully, it shall be implemented by the end of 2028.

Recommendations of TRS-1

- Pouch Centre should be eliminated as its function can be done while submitting B/Es. The Pouch Centre had already been eliminated.
- C&F Agents and importers wanted another TRS diagnose the time taken by OGAs. TRS-3 has met the demand of the recommendations.
- The manual ledger containing B/Es information maintained in the Out Pass section shall be eliminated because the same information is available in AWS. The recommendation was executed.
- To eliminate the whole process of issuing release order as by the payment can be cross checked by port and customs gate with AWS. The recommendation has been imported.

Recommendations of TRS-1

- C&F Agents had to submit hard copy of Customs documents to Port Authority as to conduct PE of the consignment. This process should be eliminated as port can get soft information from Customs. This recommendation is yet to be implemented because AWS lacks to get all the papers and documents automatically.
- 7. To assess the B/Es once submitted electronically. This recommendation is yet to be implemented as it can not be implemented until full-fledged operation of NWS.
- 8. Simplification of appointment of examination officers. AROs and RO to examine and AC and above shall keep them under supervision and continuous monitoring. This recommendation has been implemented.

Recommendations of TRS-1

BCH:

- Review the business process with repetitiveness of referral of file to the senior officials and its back forth movement in export consignments. Lower officials to assess the consignments and the higher officials to supervise and monitor. This recommendation has already been executed as it was made for export cargo only.
- To reduce PE by adopting robust RMS outlined in RKC and implementing AEOs. AEOs (...) are working and Risk Management Commissionerate has established, and RM software is almost in place to buy. This recent has partly implemented with RMS inbuilt in AWS.

Recommendations of TRS-1

- To establish a fully paperless business process. This yet to be implemented. It shall be implemented once NSW works in full swing.
- Full implementation of the selectivity module of AWS for RM. This recommendation has already been executed.
- To provides RM training to the front line officers. This recommendation has been implemented more than recommended.
- To seek the cooperation form the C&F Agents on submissions of hard copy of documents without delay for faster clearance of goods. This recommendation has not been implemented rather the negligence is being acutely day by day which shall be discussed later on.

Recommendations of TRS-2

It was conducted in June 2017. It covers two LCSs: Banglabandha Land Border Crossing Station and Burimari Land Border Crossing Station. UNESCAP has financed and conducted the TRS with the assistance of Bangladesh Customs, C&F Agents and OGAs. Both the stations are small in terms of volume of cargo. The then time the systems were semi automated; the entire process is not complex because of the mode of transport, load flow and proximity with the country business is made. However, the recommendations were:

Burimari LCS:

- To install and operationalize a fully paperless system to eliminate the hard copy. The recommendation is yet to implement. National Single Window (NSW) project has already piloted for 6 CLPAs out of 39. Hopefully, it shall be implemented by the end of 2028.
- To ensure uninterrupted connectivity of AWS with the central server to ensure the effective use of the online system. It would also help to minimize the use of manual system presently use in parallel to the online system. The recommendation has already been implemented.

Recommendations of TRS-2

- To review the internal workflow and to eliminate repetitive referral of B/Es to the senior authority and the back forth movement of files senior officials shall ensure surveillance the process and give direction if necessary. The Commissioner shall monitor the whole process on a random basis periodically. The recommendation has already been implemented.
- To implement trusted trader program as outlined in RKC and WTO's TFA. AEO program is operational in Bangladesh. Therefore, the recommendation has been implemented.
- Full implementation selectivity module of AWS. The recommendation has been implemented.
- Upgrading skills of front line official to better manage the paperless system and overall RMS. It's done.
- To strengthen professional relationship with other actors involved in clearance procedure. It's done but this is a continuous process. We keep on doing it.
- To improve physical infrastructure and cargo handling capacity at Burimari LCS. The BLPA has undertaken some projects on it including Burimari.

Recommendations of TRS-2

Banglabandha LCS :

- To install AWS at Banglabandha LCS to eliminate unnecessary physical movement of documents. The recommendation has been implemented.
- To review the internal workflow and to eliminate repetitive referral of B/Es to the senior authority and the back forth movement of files senior officials shall ensure surveillance the process and give direction if necessary. The Commissioner shall monitor the whole process on a random basis periodically. The recommendation has already been implemented.
- To implement trusted trader program as outlined in RKC and WTO's TFA. AEO program is operational in Bangladesh. Therefore, the recommendation has been implemented.
- Upgrading skills of front line official to better manage the paperless system and overall RMS. It's done.
- To strengthen professional relationship with other actors involved in clearance procedure. It's done but this is a continuous process. We keep on doing it.
- The BLPA, Banglabandha and Bangladesh Customs may share data electronically to further simplify the procedure. This recommendation is yet to implement.

Recommendations of TRS-3

- Based on the survey findings, and the qualitative data obtained through KLLs and FGDs, this study puts forward the following recommendations to address the bottlenecks and challenges affecting the import clearance process for food, pharmaceuticals, garments raw materials, and capital machineries through the Benapole land port, Chittagong sea port, and Dhaka airport.
- The recommendations are categorized into two segments: common recommendations that need to be implemented in all three ports, and specific recommendations that can help improve the concerns of individual ports. In both cases, recommendations are subcategorized under three broad headings: Process improvement, Logistics/Capacity Building, and OGA Clearance. Along with the recommendation body and the timeline for implementation are proposed in the following matrix.

Common Recommendations:

- Process Improvement: Bank Documents and Manifest.
- Integrating concerned stakeholders into the AWS and the National Single Window (NSW).
- Implementation of PAP provisions.
- Introduction of system-generated notification for IGM submission.
- Eliminate of DTI-based B/E submission.

Process Improvement: Risk Selectivity & Examination:

- Enabling a robust Risk Management System.
- Implementation of Authorized Economic Operator (AEO) and trusted trader programs.
- Introduction of AWS based examination officer assigning system.
- Uploading real-time examination data in the AWS.
- Introduction of AWS based assigning system for absent/unavailable assessment officers.
- Extending AWS access to Customs brokers to identify assessment officers.
- Introduction of system-generated test message to importers after completion of assessment.

Logistics/Capacity Building:

- Expediting implementation of the NSW project.
- Restructuring NBR's ICT wing.
- Vacancy based recruitment.
- Arranging motor vehicle and walkie-talkie system in the examination/jetty area.
- Competency-based staff development.
- Increasing the number of weighing scales and integrating weighing data into AWS.
- Establishment of a central chemical lab and modernization of existing Customs labs.
- Installing more scanners and integrating scanning systems in the AWS.
- Full implementation of the electronic payment system.

OGA Clearance:

- Establishing integrated testing facilities for all certification agencies near the port.
- Integrating of BEPZA in the AWS.
- Enabling OGAs to apply Risk Management best-practices.
- Ensuring intra-and inter-agency coordination.
- Installing electronic payment systems for port dues.
- Progressive penalty provisions for purposeful delayers.
- Revisiting the AWS selectivity criteria for BSTI examination.
- Resetting BCSIR's testing parameters.
- Signing Mutual Recognition Agreements.

Chittagong Sea Port- Process Improvement:

- Addressing the indent request issue of the CTMS/TOS.

Dhaka Airport-Process Improvement: Manifest

- Eliminating of hard copy signing of airway bill.
- Enforcement of mandatory submission of IGMs before the departure of aircraft from the origin.
- Elimination of signature on assessment notice.
- Elimination of document checking at the delivery gate.
- Elimination of manual data entry in the delivery register.

Dhaka Airport-Capacity Building/Logistics:

- Increasing cargo handling capacity.

Specific Recommendations:

Benapole Customs House: Process Improvement

- Empowering transport operators to submit manifests directly to the AWS.
- Elimination of manual manifest collection and submission of manual B/E.
- Establishment of a computer based joint CARPASS system.

Benapole Customs House: Capacity Building/Logistics

- Development of Port infrastructure (shed areas and corresponding roads)
- Automating the Port processes.
- Diversification of mode of transport to reflect the increasing trade volumes.
- Establishing local BSTI and BCSIR lab at the port vicinity.

Key Findings in TRS-3

- **Sample size and data collection period: 1209 Bills of Entry during 22–26 May 2022**
- **Average clearance time:**
 - Benapole: 10 days 8 hours
 - Chattogram: 11 days 6 hours
 - Dhaka: 7 days 11 hours
- **Commodity-wise comparison**
 - Dhaka fastest for garments raw materials
 - Chattogram slowest for pharmaceuticals
 - Benapole fastest for food items
- **Pre-arrival processing (PAP) reduced clearance time by up to 57%**
- **72–78% of time consumed before customs declaration (document collection/submission)**

Updates on Evaluation of TRS-1, TRS-2 & TRS-3

- In **TRS-1** the total number of recommendations were 14; out of 14, 10 recommendations were fully implemented; 1 recommendation was partly done because this is a continuous process. Therefore, the execution rate is 75%.
- In **TRS-2** the total number of recommendations were also 14; out of 14, 4 recommendations were mutually inclusive. The execution rate is 60%.
- In **TRS-3**, the recommendations were made on category basis: Organization based, and Function based. The implementation of National Single Window which is rendering its trial operation may provide a big boost on the implementation of TRS recommendations.
- Therefore, the TRS reports, and execution updates coincide with the WCO manifestation, “Members are encouraged to measure and publish their average release time of goods periodically and in a consistent manner, using tools such as, inter alia, the Time Release Study of the Worlds Customs Organization”.

Challenges on Conducting TRS in Bangladesh

- Lack of prior experience and knowledge among officials
- Limited awareness of WCO TRS tools
- Initial resistance from customs brokers
- Need to involve all relevant cross-border regulatory agencies
- Formation of a Central TRS Committee and field-level mini working groups
- Ground-level data collection and system data validation
- National data validation workshop held for quality assurance
- Final report drafted and reviewed with WCO technical support

Bottlenecks Identified During Conduct of TRS

- Semi-manual and paper-based processes
- Low adoption of pre-arrival processing due to limited awareness
- Legal restrictions (IPO and agency regulations) requiring 100% intervention for food items
- Fragmented coordination among agencies
- No unified testing facility near ports
- Limited lab capacity and absence of labs (e.g., Dhaka Customs House)
- Incomplete implementation of AEO program
- Absence of an integrated, robust risk management framework

THANK YOU!

