



# Pakistan Customs Risk Management System

Mr. Azhar Husain Merchant

Director Risk Management Unit

DIRECTORATE GENERAL OF INTELLIGENCE & RISK MANAGEMENT (DG I & RM) – CUSTOMS PAKISTAN



## **Scheme of Presentation**



- TFA Article 7.4 Risk Management
- Pakistan's International Trade
- Risk Management in Pakistan Customs
- Selectivity Criteria Results
- Recent Initiatives & Challenges
- Future Roadmap



## **Agreement on Trade Facilitation**



#### ARTICLE 7: Release And Clearance Of Goods

#### 4 Risk Management

- 4.1 Each Member shall, to the extent possible, <u>adopt or maintain</u> a risk management system for customs control.
- 4.2 Each Member shall design and apply risk management in a manner as to <u>avoid arbitrary</u> or <u>unjustifiable discrimination</u>, or a <u>disguised restriction</u> on international trade.
- 4.3 Each Member shall concentrate customs control and, to the extent possible other relevant border controls, on <u>high-risk</u> consignments and expedite the release of <u>low-risk</u> consignments. A Member also may select, on a <u>random basis</u>, consignments for such controls as part of its risk management.
- 4.4 Each Member shall base risk management on an assessment of risk through appropriate selectivity criteria. Such selectivity criteria may include, inter alia, the Harmonized System code, nature and description of the goods, country of origin, country from which the goods were shipped, value of the goods, compliance record of traders, and type of means of transport.





# Pakistan's International Trade



# Pakistan's International Trade



#### (figures in thousands)

FY 2023-24		FY 2024-25		
	No. of	No. of	No. of	No. of
	<b>Declarations</b>	Containers	<b>Declarations</b>	Containers
Imports	820.7	850.9	898.8	907.2
Exports	878.2	770.4	932.4	694.3
Total	1,699.0	1,621.3	1,831.2	1,601.5



### **International Trade Revenue Contribution**



#### Import / Domestic Stage Tax Collection (% Share)

Tax Head	Import (%)	Domestic (%)
<b>Customs Duty</b>	10.9	0.0
Sales Tax	19.4	13.8
Federal Excise Duty (FED)	1.2	5.3
Direct Taxes	3.6	45.7
Total	35.2	64.8





# Risk Management in Pakistan Customs



## **Important Legal Provisions**



#### Customs Act, 1969

#### **Definitions (sec. 2)**

- Risk Management System
- Risk Management Committee
- Selectivity Criteria

#### Implementation of RMS

- Examination / assessment on the basis of selectivity criteria (sec. 80)
- Transshipments subject to risk selectivity criteria (sec. 121)



### **Organizational Structure**



#### Chairman

Federal Board of Revenue (FBR)

#### Member

(Customs Operations)

#### Member

(Customs Policy)

Director Generals & Chief Collectors

#### **Director General**

Intelligence & Risk Management (I & RM)

#### **Director**

Risk Management Unit (RMU) Director HQ I & RM

Regional Directorates



### Organizational Structure...cont.



#### □ Customs Team:

- o Directorate General of Risk Management: Custodian of RMS\*
- o Risk Management Committee (RMC): Highest decision making body headed by Director General and comprises of senior Customs officers
- o Local Risk Management Committees (LRMC): to review risks at Collectorate level; make suggestions to DG I&RM / RMC

#### □ Technical Team:

 ○ IT based arm of the DG RM – part of Pakistan Single Window (PSW)

<sup>\*</sup> Role and responsibilities provided under Chapter XXXI, Customs Rules 2001



# **Risk Management Progression**



- 2003: Profile—based examination & assessment (manual clearance)
- 2004: PaCCS Automated Web-based clearance with:
  - o risk based clearances (Red/Yellow/Green)
  - o Two tier RMS Manifest filing and Goods Declaration
- Indigenous Web Based One Customs (WeBOC) system, with:
  - Trader profile and declaration based scoring system; Risk categorization (commodity, port of loading, exemption, etc.)
- 2017 FBR & UK Customs Machine Learning (ML) model
- Sep 2025 RMS 2.0 enhanced AI / ML model



# **RMS Coverage**



- ❖ Import and Export consignments at all seaports, airports and dry ports of Pakistan.
  - Sea Ports (Karachi, Port Qasim, Gwadar)
    - On-dock and Off Dock Terminals
  - Airports (Karachi, Lahore, Islamabad, etc.)
  - Dry Ports (Lahore, Faisalabad, Peshawar, Quetta, etc.)
  - Land Border Stations (Taftan, Wahgah, Torkham, etc.)



## **RMS Features**



#### Inflexible factors:

• Import / Export Policy restrictions

#### Flexible Factors:

- Risk Categorization Value, HS Code, quantity, exemption etc.
- Multiple risk factors GD parameters, trader's profiles

#### • ML Data model (IREE)

Channel	Physical Inspection /Scanning	Document Review / Assessment	
Green	No	No	
Yellow	No	Yes	
Red (Incl. Blue)	Yes	Yes	



# **Application of Selectivity Criteria**



Trader's Declaration

Flexible factors

Value, Qty., exemption, HS Code

Profile of trader

Compliance

history

Inflexible factors

include IPO/EPO restrictions.

AI/Data ML model for imports Field
formations
can apply
the local
RMS (Red
&Yellow
only)

Green

Red (incl. Blue)

**Yellow** 



# RMS Flagship Program ML IREE-V3 (Third Iteration)



#### □ Risk Assessment and Fraud Detection

- Using advanced Machine Learning (ML) algorithms to develop predictive models for identifying potential risks and detecting fraudulent activities
- Successfully implemented Import Risk Evaluation Engine (IREE) for Red Channel Marking, which has significantly contributed to detections / revenue collection





# RMS Selectivity Criteria Results



# **RMS Clearance - Imports**



#### **Goods Declaration-wise**

Clearance Channel	2020-21	2024-25
Green	40.74%	46.0%
Red	40.53%	36.3%
Yellow	18.72%	17.7%

#### **Container-wise**

Clearance Channel	2020-21	2024-25
Green	47.60%	53.7%
Red	31.94%	29.7%
Yellow	20.46%	16.6%



# **RMS Clearance - Exports**



#### **Goods Declaration-wise**

Clearance Channel	2020-21	2024-25
Green	50.7%	73.4%
Red	32.5%	17.8%
Yellow	16.8%	8.8%

#### **Container-wise**

Clearance Channel	2020-21	2024-25
Green	73.3%	81.5%
Red	19.0%	9.5%
Yellow	7.7%	9.0%



# Detections / Revenue Increase (FY 24-25) FBR



Clearance Channel	GDs	Additional value %	Additional Tax %
Green	409,562	0.0%	0.0%
Red	322,921	10.9%	19.4%
Yellow	157,486	2.6%	2.0%
Total	889,969	3.2%	5.8%



# AI / ML Data Model (IREE) Detections



(Sep '25)

GDs Marked Red	IREE Red % share	IREE GDs HIT rate	IREE Red recoveries / total red recoveries % share
29,168	36%	79%	86%



## **Recent Initiatives**



#### **RMS 2.0**

- ❖ AI / ML based system RMS 2.0 developed and under Simulation environment in WeBOC w.e.f. Sep 01, 2025
- ❖ Agreement with Technology for People Initiative (TPI), Lahore University of Management Sciences (LUMS)
- ❖ To be deployed on Live clearances after test run (Jan '25)

Automatic Entry Exit System (AEES) – Non Intrusive Inspection (NII)

- HD Scanners installed at Karachi / Port Qasim Container Terminals
- Transit, Transshipment, Import & Export cargo to undergo NII
- \* To be fully implemented in Dec '25



## **Recent Initiatives**



#### RMS 2.0

- \* AI / ML based system RMS 2.0 developed and under Simulation environment in WeBOC w.e.f. Sep 01, 2025
- \* Agreement with Technology for People Initiative (TPI), Lahore University of Management Sciences (LUMS)
- ❖ To be deployed on Live clearances after test run (Target Jan '25)

#### **Automatic Entry/Exit System – Non-Intrusive Inspection (NII)**

- ❖ HD Scanners installed at Karachi / Port Qasim Terminals
- Transit, Transshipment, Import & Export cargo to undergo NII
- Initiation first week Dec '25 Full implementation end Dec '25



# **Challenges / Limitations**



- Qualified and Skilled Human Resource
  - Business knowledge & experience
  - Technical skill & experience
- Hardware for information extraction & NLP



# Future Roadmap – (NLP & ML)



#### □ Language Translation and Interpretation

- Using Natural Language Processing (NLP) & Text Mining
  - Test Case HS Code recommender system to assist traders and officers

#### □ Intelligent Document Processing

- Using NLP techniques for automated extraction from documents
  - Test case extracting information from invoice/packing list and other documents for system-based verification, risk analysis and assessment filing





# **THANK YOU**



# Key Functions of Risk Management Committee



- To review performance of RMS
- To review risk parameters and behavior of important risk indicators
- \* To set benchmarks for interventions targeting the risky consignments or entities
- \* To review major detections by the Collectorates or Directorates (I&I)-Customs with respect to RMS.