



Saint-Lucia – Time Release Study

Final Report
2022





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The TRS Working Group and the experts would like to express their gratitude to the Senior Management of both the Customs and Excise Department and the Ministry of Commerce as well as officials from SLASPA and representatives from freight forwarding and clearing companies for their guidance and availability from the beginning of the Time Release Study.

With regards to the pilot TRS, the experts would like to particularly acknowledge the meaningful contribution and unwavering commitment of the following partners

- Ministry of Commerce, Manufacturing, Business Development, Cooperatives and Consumer Affairs;
- Customs and Excise Department;
- Saint-Lucia Air and Sea Ports Authority;
- Shippers Association;
- Chamber of Commerce, Agriculture and Industry;
- Ministry of Health, Wellness and Elderly Affairs;
- Ministry of Agriculture, Fisheries, Food Security and Rural Development.

Saint-Lucia would also like to acknowledge the ICR Facility and its donors for the financial and technical support availed throughout the undertaking of the TRS.

ACRONYMS

AEO	Authorized Economic Operator
CP	Castries Port
FQ	Field Questionnaires
KPI	Key Performance Indicators
OGA	Other government Agency
RKC	Revised Kyoto Convention
SLASPA	Saint Lucia Air and sea Ports Authority
SL-CED	Saint Lucia Customs and Excise Department
SAFE FoS	SAFE Framework of Standards
TRS	Time-Release Study
TRS WG	Time-Release Study Working Group
WCO	World Customs Organization
WTO	World Trade Organization
WTO TFA	World Trade Organization Agreement on Trade Facilitation

EXECUTIVE SUMMARY

Saint Lucia embarked on the undertaking and completion of a Time Release Study (TRS) in 2022 as part of its endeavours to improve its trading environment as well as to meet its international obligations under the World Trade Organization (WTO) Agreement on Trade Facilitation (WTO TFA), specifically Article 7.6 which encourages WTO Members 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 World Customs Organization (WCO).

This TRS Report presents a broad assessment of the cargo clearance process as it relates to the Saint Lucia Customs and Excise Department (SL-CED) and the Saint Lucia Air and Sea Ports Authority (SLASPA). The outcomes of this study create a sound baseline for the impact assessment of planned trade facilitation such as the upcoming single window for trade platform. Furthermore, the TRS report identifies trade facilitation border management processes’ optimization solutions related to the clearance of goods at the Port of Castries and beyond.

As per recognized international guidelines related to the undertaking of a TRS, the following was executed:



A national TRS Working Group was formally established. The TRS Working Group comprised of representatives from the public (Customs Department, Ministry of Commerce...) and private sectors (customs brokers, importers...). This collaborative public-partnership approach to the TRS was well received by the TRS WG Members and acknowledged as a good practice to be replicated for future trade facilitation initiatives at national level.



The scope, duration and timing of the TRS was agreed upon by the TRS WG during the initiation and planning phase of the TRS.



Data collection and analysis tools were tested during TRS pilot exercises, which allowed for their refinements and subsequent use in the full TRS exercise.



The TRS data analysis results and recommendations were validated by the TRS WG Members.



The TRS results and recommendations were subsequently disseminated in the public domain through a press release.

Besides providing the international and national trading community with the average clearance times at the Port of Castries, the TRS also enabled Saint-Lucia to undertake initial process mapping related to the Customs and Port clearance processes. This process mapping will prove useful for future business process optimization and digitization efforts such as the establishment of the planned Saint-Lucia National Single Window Platform.

The TRS 2022 in Saint-Lucia focused on importations at the main port in Saint-Lucia, namely the Castries Port, that entered the country between the 30th of May 2022 and the 3rd of June 2022.

The study analysed 1875 importation entries in total.

Based on the TRS efforts undertaken, the following has perspired:

Average times

between manifest submission
and actual release of the goods



**10 days, 17 hours,
48 mins and 3 seconds**

between cargo arrival
and actual release of the goods



**10 days, 15 hours,
45 mins and 41 seconds**

between customs declaration submission
and actual release of the goods



**4 days, 7 hours,
50 mins and 2 seconds**


from the of payment of all duties and fees
to the release of inspected goods





**under
24 hours**


It is also important to note here that while 12% of all assessed Customs Declarations were directed towards the blue lane (fast lane for transactions to be assessed as part of a Post-Clearance Audit), 70% of all assessed customs declarations were channelled to the red lane, which requires a documentary assessment and physical examinations of the good and no declaration (0%) were allocated to the green lane (no control lane). The high proportion of Customs declarations being directed to the red lane could indicate that (i) there are high levels (voluntary and/or involuntary) of non-compliance amongst the customs brokers and importers' trading community in Saint-Lucia; and/or (ii) the Customs Risk Management framework needs strengthening.


The undertaking of the TRS also brought forward the following overall recommendations:


-
-  1. - Strengthen business intelligence function / reporting capacities, especially within Customs;


 -  2. - Reflect on fast-tracking the roll-out of electronic payment, pre-arrival processing and the establishment of the National Single Window for Trade;

 -  3. - Enhance border agency cooperation as per WTO TFA recommendations;

 -  4. - Enhance public-private partnership to improve the trading environment;

 -  5. - Consider the expansion of working days at the Port of Castries, to at least 6 days and to consider also 24h operations, at least for part of the working week;

 -  6. - Strengthen Customs' risk management framework, including the need for Customs to ensure that their frontline officers accurately and consistently fill in the inspection act to reflect the findings of physical examinations;

 -  7. - Introduce or enhance the roll-out of trade predictability and risk-based facilities such as advance rulings, post-clearance audit and authorized operators programme.
-



Overall, this TRS exercise in Saint Lucia must be seen as an opportunity for learning as it provided relevant average clearance times information as well as meaningful orientation for the improvement of the trading environment in Saint-Lucia. However, the undertaking of the TRS was complex at times due to the limited availabilities of key TRS WG Members and business intelligence reporting capacities, which hampered data collection and analysis efforts. This was also due to the TRS being executed during a period when COVID was still relevantly widespread in St. Lucia. Hence, St. Lucia is invited to not only act upon the recommendations formulated in this report but also on the learning points identified when undertaking TRSs in the future.

The background of the page features a close-up, slightly blurred image of a flag. The flag has a blue upper section and a green lower section, separated by a white horizontal stripe. A yellow triangle is visible in the lower right quadrant, and a white arc is overlaid on the flag's design. The overall image has a soft, ethereal quality with a light blue and green color palette.

PART I.

Background



A. Saint Lucia

Saint Lucia, an island state in the Caribbean, is the second largest of the Windward group in the Lesser Antilles with an area of 238 square miles. It is located about 24 miles (39 km) south of Martinique and some 21 miles (34 km) northeast of Saint Vincent and the Grenadines and has a population of 184,751 as of 2021.

Saint Lucia's main exports and principal foreign exchange earners continue to be tourism services, mainly travel, manufactured goods (mainly beverages, processed foods, paper products and assembly-type electronic products) and primary commodities (bananas...). Main imports include food, fuels, and manufactured goods including petroleum oils, meat and edible offal of poultry, motor cars and other motor vehicles and medicaments. Saint Lucia's merchandise imports are consistently larger than exports with an estimated EC\$1.36 billion in imports when compared to EC\$ 149.1 million in exports in 2020. The main trade partners include the United States, United Kingdom, Trinidad and Tobago and the rest of CARICOM.

Saint Lucia is signatory to several multi-lateral and bi-lateral trade agreements with Partner countries including the CARIFORUM-EU Economic Partnership Agreement and the Revised Treaty of Chaguaramas establishing the Caribbean Community including the CARICOM Single Market and Economy (CSME). The CARIFORUM-EU Economic Partnership Agreement (EPA) between CARIFORUM States and the European Union (EU) and its twenty-eight Member States ushered in a completely new trading relationship between CARIFORUM and the EU. The Agreement covers,

inter alia, trade in Goods, Services and Investment, Competition Policy, Innovation and Intellectual Property, Transparency in Public Procurement, Environment and Social Aspects, and Personal Data Protection. The EPA provides for duty-free and quota free access for goods of Caribbean origin in the EU and UK market. Following Brexit, on March 22, 2019, CARIFORUM Member Countries began signing an economic partnership agreement with the United Kingdom known as the CARIFORUM-UK EPA.

At the global level, Saint-Lucia is a Member of the World Customs Organization and World Trade Organization. As a Member of the WTO, Saint-Lucia has committed to the implementation of the measures of the WTO Agreement on Trade Facilitation (WTO TFA), which has entered into force in February 2017. In particular, Saint-Lucia has requested the support of the Investment Climate Reform (ICR) Facility for the implementation of Article 7.6 of the WTO TFA:

“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 World Customs Organization (WCO)...”

Through the TRS, Saint-Lucia aims to not only identify optimization solutions for border management processes but also to facilitate the design as well as the impact assessment of the upcoming single window for trade platform through customs clearance process mapping and the measurement of the goods clearance time at the port of Castries.

B. St Lucia – Customs and Excise Department (SL-CED)

The undertaking of a Time Release Study based on the WCO methodology requires heavy involvement from Customs Administrations. St-Lucia Customs and Excise Department (SL-CED) is, hence, a critical actor in the execution of the TRS. SL-CED’s mission includes the facilitation of licit and compliant trade as well as the protection of Saint-Lucia’s borders, citizens, economy, environment and cultural heritage amongst others. As such, the TRS provides a unique opportunity for customs to assess its customs clearance performance.



Headquarters of Customs Administration.



Saint-Lucia TRS Working Group Members.



PART II.

Purpose, Methodology and Scope



Customs Officer at the Port of Castries.

A. Time-Release Study – What is it?

A time release study is a globally recognized trade facilitation performance measurement tool that helps, amongst others, to:

- Measure the average time between the arrival of selected goods at a port of entry and their exit from that port of entry;
- Measure the time required for selected interventions between the arrival and release of the goods;
- Measure the time specifically required for Customs Administrations to undertake their part of the goods' clearance process;
- Explore interfaces and relationships between different public and private agencies involved in the goods' clearance process;
- Gather qualitative information from systems and process users.

The WCO has developed and refined its TRS methodology over the years and the latest version of its guidance to its Members can be found in the WCO TRS Guidelines Version 3 (2018). The Agreement specifies that each Member may determine the scope and methodology of such average release time measurement in accordance with its needs and capacity.

Ultimately, undertaking a Time Release Study provides an opportunity for countries to:

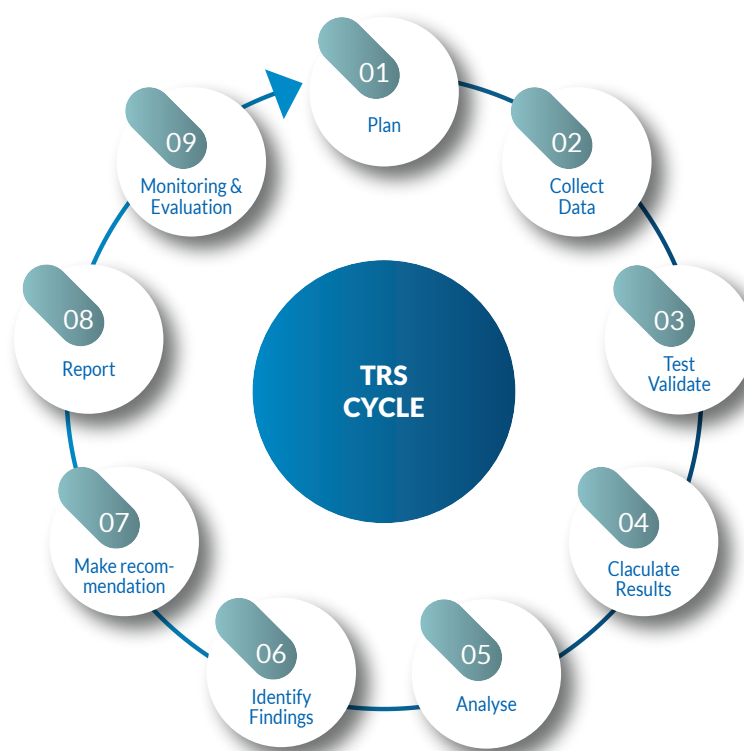
- Diagnose the efficiency of specific customs procedures;
- Identify measures to improve compliance and / or enforcement;
- Devise solutions to optimize the overall clearance of goods procedures and processes, and specifically customs procedures and processes;

- Develop informed strategic plans and modernization programmes/initiatives;
- Adapt relevant Customs legislation and strategies;
- Improve customs transparency;
- Meet the requirements under article 7.6 of the WTO TFA;
- Apply recognized practices and global standards such as the WCO TRS Guidelines;
- Promote Customs as a proactive and modernization leader in the trade facilitation landscape.
- Engage constructively with the stakeholders involved in the clearance of goods process
- Position the country with regards to a globally recognized benchmark.

B. Time-Release Study – How?

In its 2018 WCO TRS Guide, the WCO suggests to its Members to follow the TRS cycle presented below:

Figure 1: TRS Cycle according to the WCO TRS Guide, Version 3 (2018)

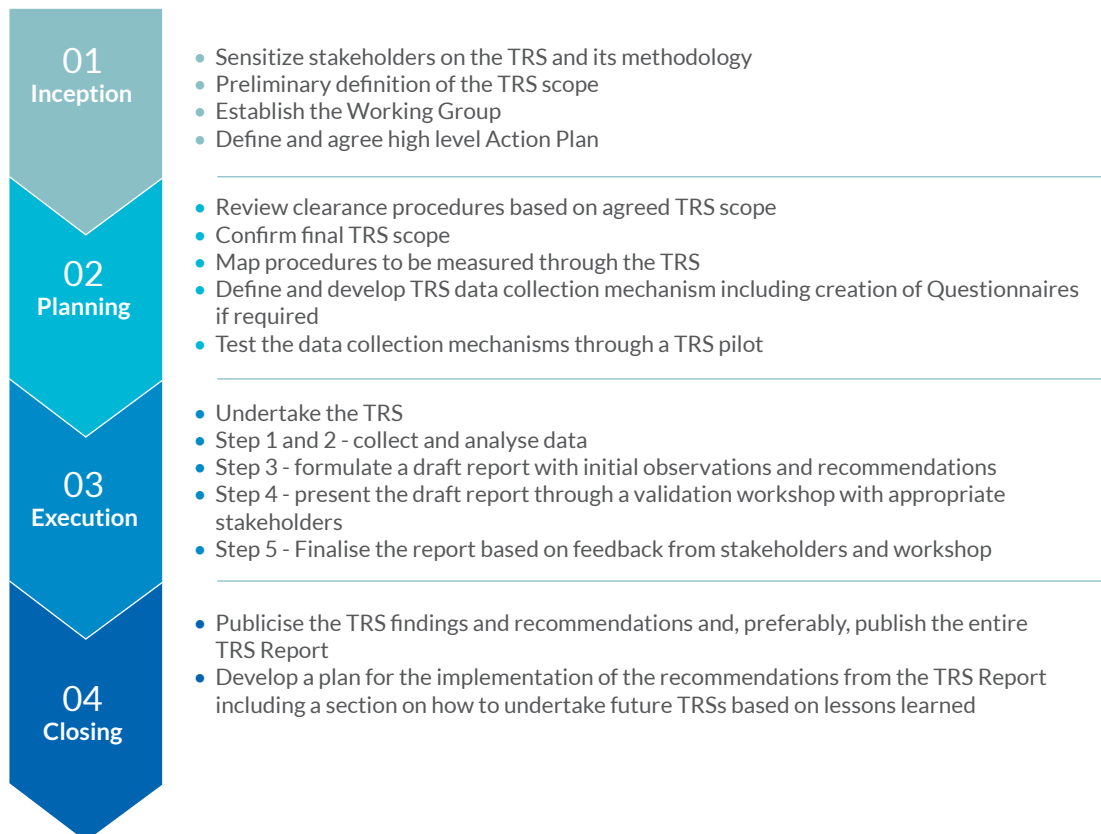


Similar to any customs reform and modernization initiatives, a TRS can also be broken down into 4 phases:

Figure 2: TRS - Phases

The Saint-Lucia TRS Working Group has decided to adopt a phased approach to the implementation of its TRS.

Under each phase, a specific set of activities was completed. The phases were sequential and the TRS could not move into the next phase until the previous one has been completed. The set of activities undertaken under each phase is presented in the figure below.

Figure 3: TRS – Phased Approach – Activities

C. Time-Release Study – Scope

i. Time-Release Study – Scope

Following a trade flow review and analysis of the clearance of goods' processes and their related performance measurement tools, the TRS Working Group opted to:

1. Focus solely on the importation process at Castries Port;
2. Focus on the importation of all commodities excepting personal effects importation, non-commercial, petroleum products and ozone depletion linked commodities;
3. Focus specifically on physical examinations on only commercial break bulk cargo importations at the Castries Port
4. Focus specifically on Customs processes as well as on SLASPA processes.

In terms of the TRS duration, the SL-CED opted to follow a modified version of the WCO recommendations and conduct the TRS over 5 consecutive days rather than 7 consecutive days as Customs only operate a 5 out of 7 service. The TRS took place from 30 May to 3 June 2022.

This was followed by data collection and dissemination efforts. The data analysis, TRS report writing and TRS publication efforts were subsequently undertaken.

ii. Focus on data collection and calculation efforts

Based on the experience of the pilot TRS and with the support of the ICR experts, the TRS Working Group was able to (i) develop a focused questionnaire for the time assessment of physical examinations; (ii) develop reporting functionalities in the ASYReport module within ASYCUDA.; and (iii) leverage on SLASPA's information system to analyze the SLASPA processes related to the clearance of goods. Distribution of the questionnaires were done solely at Shed 6. It is, also, important to highlight here the support provided by the Ministry of Commerce in the coordination of efforts and in the collation and calculation of data.



PART III.

Results and Recommendations

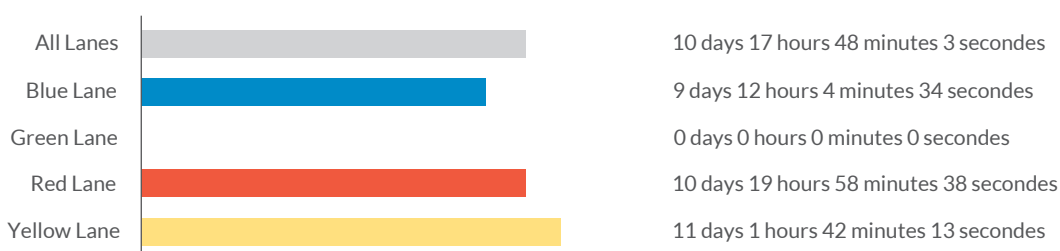
A. Overall Results

Challenges have been encountered in assessing overall process performance for the clearance of imported goods through Castries Port due to a lack of common identifiers and the limited number of examination questionnaires submitted as a result of the short period of the survey. Data collected by SL-CED and SLASPA has, therefore, been analysed separately and an independent analysis of the data collected from the questionnaires has also been made. Staff absence impacted on the time frame for this TRS as did regular and timely communications between the stakeholders engaged in the project. This may be as a result of COVID affecting staff and the general demands of staff performing their normal duties in addition to TRS activities. The following overall timings were captured:

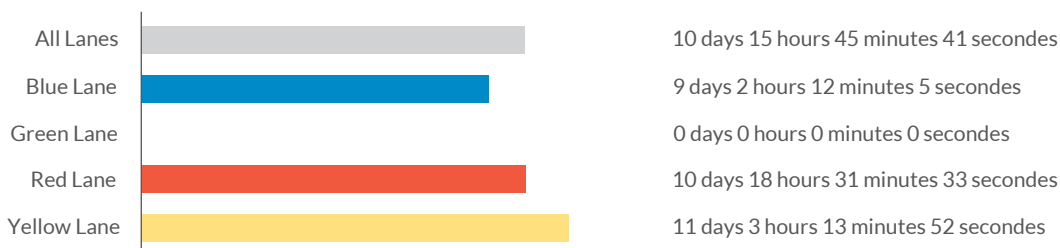
Overall timings

For the period of 30 May 2022 to 03 June 2022

Manifest Submission to Exit



Manifest Arrival to Exit



Declaration Submission to Exit



Source SL-CED



Timings related to inspections

Payment to Tray (Start of Verification)	22 hours 46 minutes 12 seconds
Verification of Documents	22 minutes 48 seconds
Physical inspection of Goods Start to End	10 minutes 12 seconds
End of Inspection to Release	9 minutes
Tray to End of Inspection	4 hours 2 minutes 24 seconds
Tray to Release of Inspected Goods	4 hours 10 minutes 48 seconds
Payment to Release	23 hours 57 minutes

Source SL-CED

Based on the data analysed and TRS mission, the following general observations have been made:

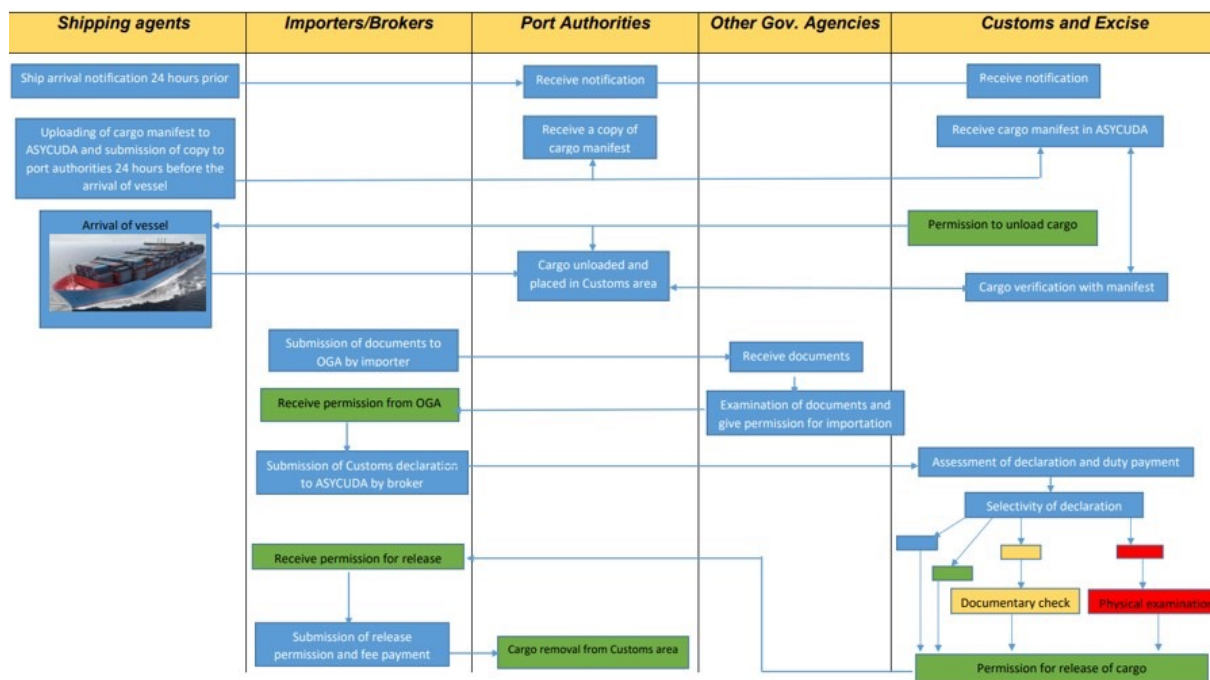
- While Customs and Cargo agents use a common identifier of the waybill number and voyage information to track imports, SLASPA uses a UNITRACK system generated number which made it difficult to link imports.
- Customs procedures only account for 40% of the total time taken for the clearance process
- Automated systems (UniTRACK, ASYCUDA) do not interface for data presentation
- Performance measurement for clearance of goods is not a standard feature within SL-CED
- Risk management is underdeveloped within SL-CED. No Green-lane routing was applied during the TRS period
- Improvements could be made to stakeholder engagement and cooperation
- Data could be more usefully employed for decision making purposes
- Customs only operate a service at Castries Port from 08.00am – 16.30pm Monday to Friday. There is no weekend or bank holiday service. At present this meets trade requirements but should be carefully monitored to ensure flexibility to meet demand
- Payment of duties and other costs is by card and cash or through electronic payment using prepayment accounts and guarantee

Key Recommendations (general)

- Develop a mechanism to collect, collate and present data in a more meaningful way to prospective traders
- Apply analysis of current data, or create new data capture mechanisms, to set baselines and to assess efficiencies – leading to the eventual establishment of a business intelligence function
- Consideration of adopting ASYREPORT/ASYPM or some other business intelligence model to strengthen data-based decision making
- Review attendance patterns to reflect customer demand
- Review risk parameters within ASYCUDA
- Improve feedback mechanisms between front line officers and risk managers to ensure compliant traders are not delayed unnecessarily
- Strengthen partnerships between public sector agencies with roles in goods clearance.
- Create shared goals to reduce clearance times and customer service. Strengthen relationships between public sector agencies and the private sector (C2C, C2B) with more regular and more focussed discussions. In particular closer links with customs brokers could encourage greater voluntary compliance.
- Focus on automating manual services where possible, with a view to extending electronic payment through the full implementation of the recent roll out of the online card payment system.

B. Customs Processes and specific data analysis

Business Process Mapping for Sea Cargo in St. Lucia



Source – SL-CED

Observations

The recommendations and comments presented are fairly general as further analysis and designing of reports needs to be conducted on the data. Moving forward it will be critical that senior managers determine what data they require to make effective decisions (e.g. where are the major revenue leakages? Does misclassification present a greater risk than under-valuation? Are the selectivity criteria in ASYCUDA still relevant? etc).

A standard feature of ASYCUDA is ASYReport which could be configured to provide key reports that could be used to inform decision making. Such reports include those relating to clearance times and others that provide information about lane distributions of declarations. ASYCUDA also offers a dedicated performance measurement module (ASYPM), which can be provided through a support agreement with UNCTAD. It is a module that may offer a number of insights into the current inward clearance of goods.

Benefits of ASYPM

- The system interrogates the database and facilitates data mining for Customs management.
- The system offers a 'data and customs procedure' consistency crosscheck capability to Customs management.
- Data readily available for studying operational trends and enabling decision-making.
- Increased monetary value of corrections made by examiners.
- Identify staff needing to improve their capacity and performance.
- Increased compliance by consignors with Customs requirements.

Source: UNCTAD

Analysis of Data from ASYCUDA

Total Declarations processed during the period from 30 May 2022 to 6 June 2022 was 2546. It is assumed that as only 1875 declarations fall within the first two assessment criteria – 'Manifest submission to exit' and 'Manifest arrival to exit', the remaining 671 declarations were received prior to 30 May or the consignments had not been cleared by 6 June.

The average time lag between 'Manifest submission to exit' and 'Manifest arrival to exit', was 2 hours and 41 seconds. It is not known where the cargo originated as this information has not been provided. However, it is believed that more could be made of pre-arrival clearance, specifically as this relates to risk assessment as currently somewhere in the region of 70% of consignments are routed red.

Particular attention was paid to the figures in the third group of assessed data, 'Declaration submission to exit'.

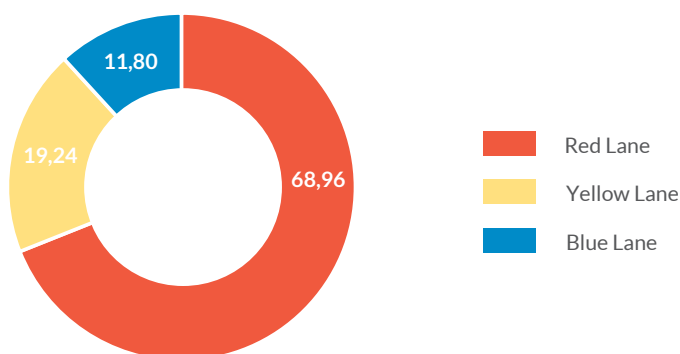
The number of declarations submitted and cleared within the study period was reported as 1949¹. Of these 230 were routed through the Blue lane, 1344 were routed through the Red lane and 375 through the Yellow lane. No declaration was routed through the Green lane. It is not clear whether these routings relate to initial ASYCUDA selectivity or whether officers have rerouted them.

In either case it would suggest that the selectivity criteria within ASYCUDA needs to be revisited. Furthermore, a full analysis of results should be undertaken to assess whether the results obtained warrants routing such a high percentage of consignments through the Red lane. If, in fact, there are exceedingly high levels of non-compliance as this figure suggests, analysis is required to understand the reasons behind this and to explore the correct treatment to address the problem e.g. further stakeholder sensitization, higher penalty applications etc

Again, the use of meaningful data and analysis will show whether efforts should be concentrated in working on classification rather than valuation, whether understanding around rules of origin needs to be improved or whether processes are too cumbersome, complicates or there is a lack of access to useful information and support.

Distribution, by lane selection, of declarations 30 May to 6 June 2022

Distribution of Customs Declarations across the different lanes in ASYCUDA in %



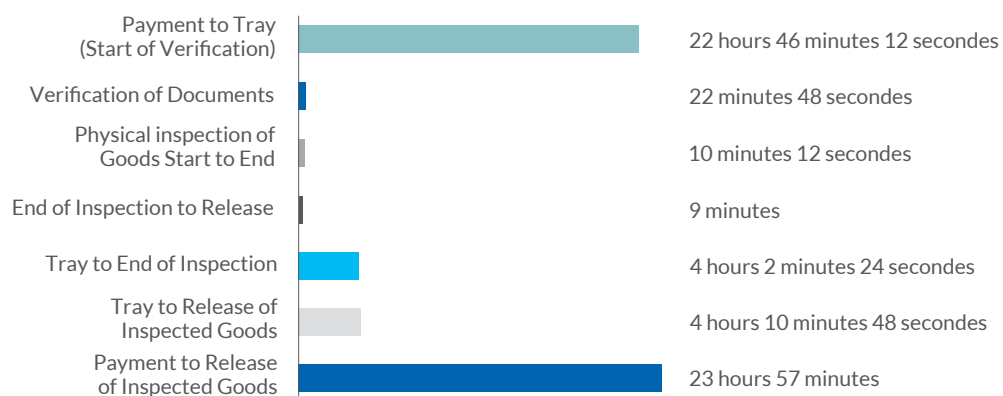
Blue lane routing, which normally reflects treatment of those declarations selected for post clearance verification based on ASYCUDA configured risk parameters appears to have a shorter average clearance time – 2 days, 10 hours, 29 minutes than those goods cleared through the other lane routings (3 days, 15 hours, 16 minutes for Yellow and 5 days, 1 hour, 35 minutes for Red).

The high percentage (%) for Red lane routings increases the average time for clearance to 4 days, 11 hours and 35 minutes.

Analysis of data from Questionnaires

1344 declarations were routed through Red lane yet only 31 examinations were recorded, and data from these inspections captured, through the specifically designed questionnaires (just over 2%). The Questionnaire is reproduced at Annex A.

Analysis of the 31 inspections, as captured on the Questionnaires:



Source: St Lucia Customs and Excise Department

It takes just under 24 hours from the time of payment of all duties and fees to the release of inspected goods, the vast majority of this time appears to be spent waiting for the verification of the paperwork to commence. This could be due to the limited working hours during which document scrutiny is undertaken.

Of the 31 inspections undertaken and recorded on questionnaires, only 21 questionnaires were fully completed. Of these 21, only 2 had potential discrepancies. One of these is awaiting further enquiries, the other appears to have had an issue with values which were amended, and duties paid. No detail was forthcoming regarding the revenue at risk in each of these cases.

As only 10% of the goods examined had discrepancies, this calls into question either the selectivity criteria in ASYCUDA or the practice of officers to overrule selectivity. It would be useful to explore why these consignments that proved 'satisfactory' (i.e. compliant) were routed Red and whether this routing has been updated.

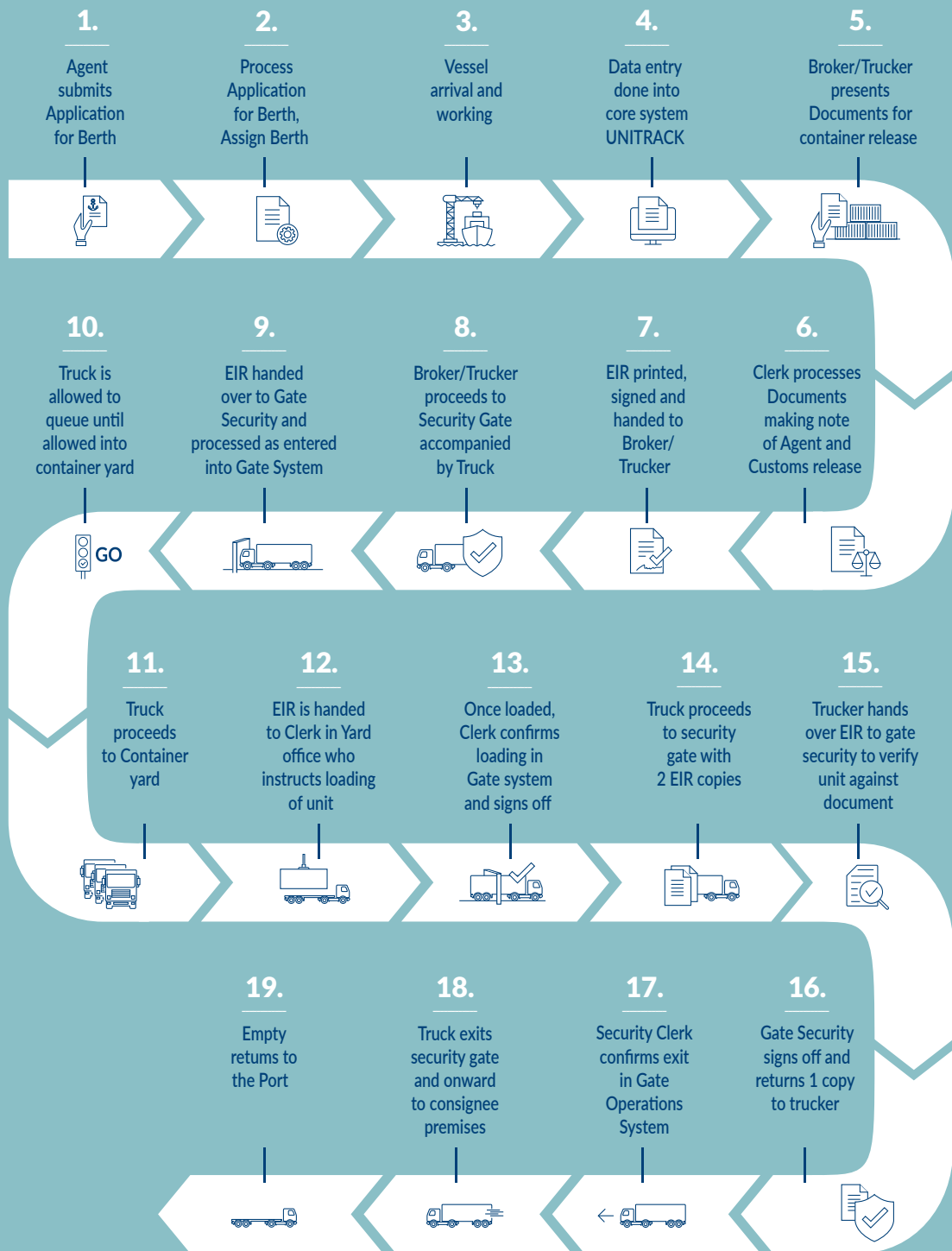
One would have to question the validity and worth of inspections that take, on average, only 10 minutes. This would need to be explored by, amongst other actions, analyzing the customs physical examinations' 'hit rate', which in essence means 'What is the percentage of customs physical examination of goods that lead to the observation of offenses/fraud?'

Key recommendations (other than those already mentioned)

- Development and usage of pre-arrival clearance procedures
- Explore possibilities for joined up examinations of consignments
- Review ASYCUDA selectivity criteria
- Analyse decisions of officers where ASYCUDA lane allocations have been rerouted. Assess risk management training needs if rerouting is yielding low results
- A full analysis of results from inspections should be undertaken to assess whether the results obtained warrant routing such a high percentage of consignments through the Red lane.
- Analysis of data to understand the reasons behind non-compliance should be undertaken to explore the correct treatment to address the problem e.g. further stakeholder sensitization, higher penalty applications etc
- Explore possibilities for greater use of prearrival, advance rulings, and post clearance audit functions
- Examine current methods for managing compliance and seek opportunities to improve

C. SLASPA Processes and specific data analysis

Business Process Map SLASPA-OPERATIONS Container Deliveries



Source – SLASPA

Observations

NB Headings in italics relate to time stamp headings in the data supplied by SLASPA

The loading of goods onto trucks and the onward transferal of these goods away from the port is conducted in a timely manner.

Whilst there was a certain amount of variation in the time taken from the Starting time of unloading of vessel to the completion of the offload this may be due to the difference in size of the vessels and the loads transported. Start time for offloading is dependant on Customs vessel clearance, preparation of containers to be discharged (unlashing) opening of hatches etc. Availability of equipment can also impact this measure.

Significant time lags were identified following the completion of the vessel offload and the arrival of the trucks to collect the goods. SLASPA has no bearing on arrival times of trucks after unloading. This is dependent on the Consignee's ability to clear based on their individual circumstances. These may, in part, be due to different commodity types. For instance, the first vessel may have been carrying perishable goods that would have been afforded a more rapid clearance. Perishables, whether chilled, frozen or otherwise, is cleared by the Consignee at their discretion. It is not automatic to clear perishables directly upon offloading of a vessel, although this service is available. SLASPA maintains a reefer plug in facility for preservation of chilled/frozen cargo.

Additionally, there may have been a shortage of trucks; an unwillingness to pay higher rates or overtime to night drivers (all truck arrivals recorded were between 08.47am and 17.40pm) and traders may have benefited from free storage at the port that is available for the first 5 business days and can be considered a trade facilitation measure. The Port operates between 8:00 am and 4:30 pm Monday to Friday. Overtime must be requested outside these stipulated times. Further investigation and analysis to explore these time lags.

Data analysis

During the TRS period, data from 78 importations, corresponding to customs declarations of interest, were recorded by SLASPA. These consignments arrived aboard 6 vessels.

The first set of data, that has a direct impact on the goods clearance process for importations, relates to the timestamps for the 'arrival of the vessel' and the 'starting time of unloading of vessel'. The quickest time between berthing and the start of unloading was 45 minutes whilst the longest wait was 3 hours 40 minutes. These timings do not appear to have been affected by the time of day the vessel arrived. Scheduled arrival times do not necessarily mean immediate working of the vessel. It is the decision of the vessel Agent to schedule working times. These decisions are sometimes based on availability of Berths or rates of pay for commencement. Vessel delays are common and lead to waiting times for arrival even after the time is confirmed by the Agent.

The next data to be analysed was the time taken from the 'starting time of unloading of vessel' to the 'completion of the offload'. The times varied between 55 minutes and 5 hours 35 minutes, again these timings do not appear to have been affected by the time of day the vessel arrived. The difference in times could be due to the difference in size of the vessels and their load volumes. Offloading and loading times vary dependent on the stowage of units on board. The Agent may decide to load units during the offloading period which is recorded separately. Breakdowns and severe weather can also lengthen offloading times.

Following on from the ‘completion of the offload’, the next timestamp reflects the ‘arrival of the trucks to collect the goods’. There were considerable differences in the time lags for this step of the process.

For the first of the six vessels arriving during the TRS period, the time taken between off load of goods/cargo and the arrival of trucks to collect the goods was under 3 hours for all nine consignments. However, for the second vessel, the shortest time between offload and truck arrival was 1 day, 6 hours and 50 minutes whilst the longest time recorded was 3 days 11 hours and 18 minutes. For vessel three, trucks began to arrive to collect goods at 09.20am, some 7 hours after they had been offloaded with just over 50% of goods being collected by truck between the hours of 09.20am and 17.40pm. The remainder of the goods were collected the following day between the hours of 10.00am and 14.00pm. There are instances where cargo remains at the Port for long periods which is not caused by any difficulties at the Port, but through unknown reasons affecting the consignee.

Considerable variation in times between offload and truck arrival were witnessed in relation to goods arriving on the fourth vessel. Of the ten consignments offloaded by 12.30pm on 2 June 2022, five were collected by trucks arriving between 13.05pm and 15.44pm on 3 June 2022 over 24 hours later. Two further commodities were not collected until 10 June 2022, and one remained until 15 June 2022.

The fifth vessel docked on 7 June 2022 and offloading was complete by 18.30pm. Thirteen of the fifteen consignments were collected between 09.27am and 15.40pm on 8 June 2022 whilst the remaining two consignments were collected the following day between 13.30pm and 15.30pm.

Finally, offload was complete for the sixth vessel by 09.25am on 7 June 2022. Whilst five of the fourteen consignments were collected within five hours of this timestamp, three others were not collected until 48 hours after offload. Two consignments were cleared on 10 June 2022, two on 13 June 2022, two on 15 June 2022 and the final consignment was not collected until 21 June 2022 some 14 days after offloading was complete. The consignees clearing goods must go through their own processes such as release of documentation from Carriers, Bank transactions, Customs Documentation, ability to receive and store their commodities, awaiting their turn at SLASPA on a first come first serve basis. There is a queue for trucks entering the Port and an electronic monitoring process for delivery of containers.

The time taken from the ‘arrivals of the trucks to collect goods for removal’ to the ‘completion time of loading of the container on the truck’ is reasonable with the shortest time being 1 minute and the longest time being 5 hours and 35 minutes.

46 of the 78 consignments (59%) took less than 1 hour to load onto the truck

17 of the 78 consignments (22%) took between 1 and 2 hours to load onto the truck

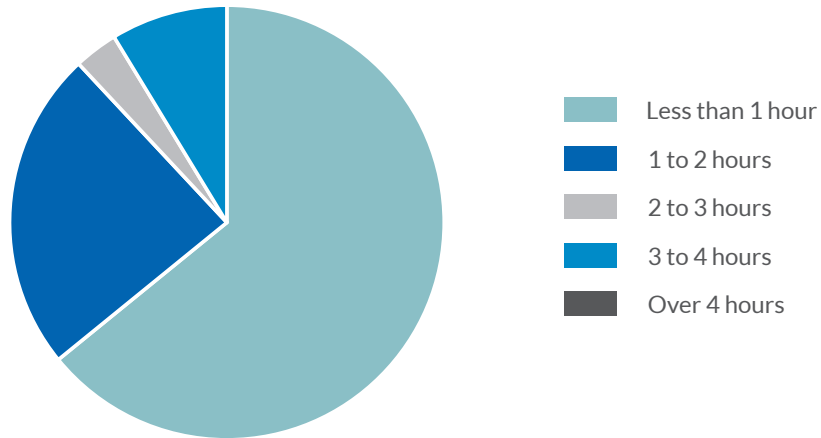
2 of the 78 consignments (3%) took between 2 and 3 hours to load onto the truck

6 of the 78 consignments (8%) took between 3 and 4 hours to load onto the truck

6 of the 78 consignments (8%) took over 4 hours to load onto the truck

1 timestamp (customs declaration number C27872) seems to be in error as it shows loading of the truck completed before the vessel has been offloaded.

Time to load trucks



In all but two instances, the time the cargo/ goods exited from the terminal following the completion of the loading of the container onto the truck was under one hour, often under twenty minutes.

Key recommendations

- Further investigation and analysis to explore the reasons behind the time lags between offload of goods and their collection by truck
- Review options for linking data to SL-CED data through a common identifier

A close-up photograph of a hand holding a silver pen, writing on a grid of squares. Some squares contain a checkmark, and others contain a small square symbol. The image is overlaid with a semi-transparent teal rectangle.

PART IV.

Lessons learned

This is the first TRS to be undertaken in Saint Lucia and this exercise must be seen as an opportunity for learning. It is anticipated that further TRSs will be conducted moving forward which will benefit from refinement in their execution due to the learning captured here.

Management of TRS – the roles and responsibilities of the TRS Working Group need to be performed in an effective and efficient manner. Time-related action points from meetings should be completed in a timely manner and a culture of responsibility and accountability within the WG should be encouraged. The delivery of remote assistance only offered by the ICR experts may have also affected the timely implementation of the TRS as it limited the direct interfacing and engagement with TRS group members. Future TRS conducted with external/advisory support would benefit from more on-site assistance.

Adherence to agreed timeframes avoids slippage and ensures momentum is maintained.

Dates for TRS should avoid bank holidays and 'non-typical' periods such as Christmas or Easter.

Responsibility for briefing and quality assurance of any questionnaires is critical to gathering meaningful information.

Removal of data from traders who opt to benefit from the 5 days free storage facility may give a more accurate view of clearance times.

There was some disparity in numbers received – the number of total Declarations processed during the period from 30 May 2022 to 6 June 2022 was 2546 yet only 1875 declarations fall within the first two assessment criteria – 'Manifest submission to exit' and 'Manifest arrival to exit'. SLASPA provided data for arrival and clearance of just 78 consignments during this period and only 31 Questionnaires were completed although 1344 declarations were routed through the Red lane and would normally fall subject to inspection.

CUSTOMS

PART V.

Conclusion



Whilst ultimately the TRS is thin in data it has highlighted a number of areas in data collection, collation and distribution where improvements can be made.

Measure 10.4 - Single window

Members shall endeavour to establish or maintain a single window, enabling traders to submit documentation and/or data requirements for importation, exportation, or transit of goods through a single-entry point to the participating authorities or agencies. After the examination by the participating authorities or agencies of the documentation and/or data, the results shall be notified to the applicants through the single window in a timely manner.

Source: WTO

Timings for clearance (in 3 of the lane routings) is now available and can act as a benchmark for pre and post single window for trade implementation. It is hoped that this platform will act as a pre-runner to the introduction of an electronic Single Window, requirement 10.4 of the WTO TFA

Initial process mapping has been undertaken and recommendations have been made for where improvements can be made that will both serve the trading community and also benefit SL-CED in terms of efficiencies.

Several of the TRS briefings and sensitisation sessions saw the attendance of brokers, SLASPA personnel and representatives from several ministries. This engagement should be encouraged and built upon.

Annex



Questionnaire

Person Completing (Name): **The name of the person completing this questionnaire and any subsequent persons if there is a handover due to a shift change or any other reason**

Location : Castries Port, Shed 6

Section A – general Information					
1	Declaration Office / Assess Number / Year				
2	Date of arrival of goods in St Lucia				
3	Does declaration cover a single HS code or multiple?	Single _____	Multiple _____		
4	List HS codes covered by the declaration?				
5	Name of importer				
6	Is this a Blue Lane assignment (Post Clearance Audit)	Yes _____	No _____		
7	Clearing Agent / Broker (name and company)				
Section B – Capture times Pre and Post examination					
8	Clearing agent (broker) places clearance documents in incoming tray for Customs	Mon. _____	Day _____	Hour _____	Min. _____
9	Customs collects documents from incoming tray and starts to verify documents	Mon. _____	Day _____	Hour _____	Min. _____
10	Customs finish verifying documents, places note on documents of decision to inspect or not and puts documents in outgoing tray for clearing agent (broker)	Mon. _____	Day _____	Hour _____	Min. _____
11	Clearing agent (broker) informs Customs of goods arrival at examination area (if applicable)	Mon. _____	Day _____	Hour _____	Min. _____
12	Goods released without physical inspection (if applicable)	Mon. _____	Day _____	Hour _____	Min. _____

Section C – Inspections Customs only					
13	Reason for customs inspection This could be suspicions X-Ray, risk profile, intelligence alert, mandatory examination of goods due to HS code or other – please specify				
14	Customs arrives at examination area	Mon. _____	Day _____	Hour _____	Min. _____
15	Canine unit contacted (if applicable)	Mon. _____	Day _____	Hour _____	Min. _____
16	Canine unit arrival (if applicable)	Mon. _____	Day _____	Hour _____	Min. _____
17	Canine unit inspection completed (if applicable)	Mon. _____	Day _____	Hour _____	Min. _____
18	Physical examination of goods starts	Mon. _____	Day _____	Hour _____	Min. _____
19	Physical examination of goods ends (if OGA involved go to box 23)	Mon. _____	Day _____	Hour _____	Min. _____
20	Release of goods from inspection	Mon. _____	Day _____	Hour _____	Min. _____
21	Release of goods from Customs control for SLASPA	Mon. _____	Day _____	Hour _____	Min. _____
22	Result of customs inspection*				
Section D – Inspections with/ by Other Government Agencies (OGA)					
23	OGA1 name				
24	Arrival of OGA1 representative	Mon. _____	Day _____	Hour _____	Min. _____
25	OGA1 physical examination/ sampling starts	Mon. _____	Day _____	Hour _____	Min. _____
26	OGA physical examination/ sampling ends	Mon. _____	Day _____	Hour _____	Min. _____

27	OGA1 authorises release of goods or not (release at Box 22 not authorised if OGA1 authorisation to release not given)	Mon. _____	Day _____	Hour _____	Min. _____
28	OGA1 or Customs informs broker accordingly	Mon. _____	Day _____	Hour _____	Min. _____
29	Result of OGA1 inspection*				
30	OGA2 name				
31	Arrival of OGA2 representative	Mon. _____	Day _____	Hour _____	Min. _____
32	OGA2 physical examination/ sampling starts	Mon. _____	Day _____	Hour _____	Min. _____
33	OGA2 physical examination/ sampling ends	Mon. _____	Day _____	Hour _____	Min. _____
34	OGA2 authorises release of goods or not (release at Box 22 not authorised if OGA2 authorisation to release not given)	Mon. _____	Day _____	Hour _____	Min. _____
35	OGA2 or Customs informs broker accordingly	Mon. _____	Day _____	Hour _____	Min. _____
36	Result of OGA2 inspection*				





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