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PARTNERSHIP FOR TRADE FACILITATION: REGIONAL SYNTHESIS

BUSINESS ENVIRONMENTS FOR AGILE MARKETS (BEAM)

July 2012

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DISCLAIMER

The author's views expressed in this publication do not necessarily reflect the views of the United States Agency for International Development or the United States Government.

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CONTENTS

LIST OF ABBREVIATIONS	III
EXECUTIVE SUMMARY	I
PURPOSE AND METHODOLOGY	3
BACKGROUND	5
DONOR EFFORTS IN THE REGION	5
KEY FINDINGS	7
COMMON THEMES ACROSS THE PTF AREAS	7
PRIORITIZATION AND RECOMMENDATIONS BY COUNTRY	15
RATIONALE	19
COUNTRY ACTION PLANS HIGH PRIORITY / HIGH IMPACT AREAS	23

LIST OF ABBREVIATIONS

AEO	Authorized Economic Operator
AR	Advanced Rulings
BEAM	Business Environments for Agile Markets
CAFTA-DR	US-Dominican Republic-Central American Free Trade Agreement
CAUCA	Central American Unified Customs Code Version IV
COMIECO	Consejo de Ministros de Economía de Centroamérica (Council of Central American Ministers of the Economy)
COMRIEDRE	Consejo de Ministros Responsables de la Integración Económica y Desarrollo Regional (Council of Ministers Responsible for Economic Integration and Regional Development)
DEI	Dirección de Impuestos Internos (Tax Authority – Honduras)
EU	European Union
EXPORTA	El Salvador export promotion agency
FTA	Free Trade Agreements
GATT	General Agreement on Tariffs and Trade
GDP	Gross Domestic Product
GOES	Government of El Salvador
GOG	Government of Guatemala
GOH	Government of Honduras
IDB	Inter-American Development Bank
IFC	International Finance Corporation
IT	Information Technology
MAG	Ministry of Agriculture – El Salvador
MAGA	Ministry of Agriculture – Guatemala
MOF	Ministry of Finance

OCA	Other Control Authorities at the points of import and export, which varies per country, but generally includes agriculture, health, police, antinarcotics, medicine authorities, among others.
OECD	Organization for Economic Cooperation and Development
PTF	Partnership for Trade Facilitation
RECAUCA	Regulations of the Central American Unified Customs Code Version IV
SAT	Superintendencia de Administración Tributaria (Tax Administration – Guatemala)
SENASA	Servicio Nacional de Sanidad Agropecuaria (National Agriculture Service – Honduras)
SIECA	Secretaría de Integración Económica Centroamericana (Secretariat for Central American Economic Integration)
SPS	Sanitary and Phytosanitary
TAIIA	Tribunal Administrativo de Impuestos Internos y Aduana (Tax and Customs Administrative Court – El Salvador)
US	United States
USAID	United States Agency for International Development
USG	United States Government
WB	World Bank
WCO	World Customs Organization
WTO	World Trade Organization

EXECUTIVE SUMMARY

At the request of the United States Agency for International Development (USAID) the Business Environments for Agile Markets (BEAM) project managed by CARANA Corporation conducted assessments in Honduras (March 2012), El Salvador (April 2012) and Guatemala (May 2012), to assess these countries' readiness to implement commitments expected under the WTO trade facilitation agreement (currently under negotiation), and define the priorities and needs for each of them in seven potential areas for technical assistance (advance rulings, internet publication, expedited shipments, penalties, appeals, pre-shipment processing, and transit guarantee systems) supported by the U.S. Government's Partnership for Trade Facilitation (PTF).

Having concluded all three assessments, and having now a regional and holistic view, the project is presenting herein a side-by-side comparison of implementation in each of the PTF categories for each country visited, as well as specific recommendations and prioritizations for each country. The report also contains recommended country action plans for further discussion by USAID and country stakeholders. We have estimated general cost parameters for each of the areas recommended as high priority / high impact in each country.

After our extensive analysis, and taking into consideration the situation of each country and their position in the region, the project concluded that El Salvador needs support in three areas: (1) further developing the internet publications of Other Control Authorities (OCA – agencies at the border excluding customs); (2) supporting the operation of the Customs Court by helping to publish its decisions online and providing technical training to its staff; and (3) promoting the use of Advance Rulings (AR). Of these, we found the area with the highest priority / highest impact to be the first, and thus recommend USAID consider focusing on developing the internet content and publications of trade-related regulations, policies, and documents of the Ministry of Agriculture and possibly Ministry of Health, depending on the availability of funds.

The recommendations for Guatemala revolve around helping the Government and trade community better understand and implement provisions of a new National Customs Law. As a result, we identified three priority areas for PTF: (1) helping to develop a fines management system for the Superintendencia de Administración Tributaria (SAT); (2) developing internet publications for the OCA; and (3) promoting the use of Advance Rulings. Of these, the first one is our recommended area of focus due to its priority and impact.

Finally, Honduras is the country that we find needs the most assistance of the three. As a result, we identified five potential support areas, of which we are recommending two that are high priority/high impact. Honduras needs: (1) support to implement a fines management system at their Tax Authority (DEI); (2) help developing an interface to allow OCA to do pre-arrival processing; (3) a redesign of their customs appeals court; (4) assistance in developing OCA internet publications; and (5) help promoting the use of AR. Of these, the fines system and pre-arrival processing by OCA (the first two) are the top priority areas.

While we have focused our country action plans only on the high priority / high impact areas, USAID has in this synthesis report, combined with the individual country assessments, a wealth of information to draw upon as it considers how to best spread its PTF support within the region.

PURPOSE AND METHODOLOGY

At the request of the USAID regional mission in Central America (ECAM), USAID/Washington's Bureau for Economic Growth, Environment and Education (E3) has sponsored technical teams to undertake an assessment of Customs trade facilitation in El Salvador, Honduras and Guatemala, with a focus on country needs as well as regional initiatives and needs. This particular report follows the three country reports submitted in May and June 2012, and focuses on the regional trade facilitation initiatives, findings and needs within the PTF categories identified below. This work is implemented under the BEAM Task Order by CARANA Corporation.

Under the Partnership for Trade Facilitation, launched in Geneva by the US Government in October 2011, the US will assist developing countries in implementing their commitments under the ongoing Trade Facilitation negotiations at the WTO. The PTF will assist developing countries by providing a pool of technical and financial resources targeting implementation of the specific proposals advanced by the United States in the negotiations. There are currently seven priorities for technical assistance (advance rulings, internet publication, expedited shipments, penalties, appeals, pre-shipment processing, and transit guarantee systems).

The CARANA assessment team was charged with three principal tasks:

- Reviewing and validating progress to date in completing the necessary actions identified in the country self-assessments regarding Guatemala's and Honduras's ability to implement the draft WTO Agreement on Trade Facilitation, and conducting a more complete assessment in El Salvador due to the lack of a recent country self-assessment,¹
- Identifying specific areas in which the United States can support trade facilitation in the Central American region in meeting WTO trade facilitation expectations, and
- Advising on other aspects of regional customs and trade facilitation initiatives where technical assistance may be appropriate and cost-effectively implemented.

Team members conducted interviews and observations at the headquarters and field offices of key international trade stakeholders in Honduras, El Salvador and Guatemala, including Customs, Ministries of Trade, Commerce, Economy, Health and Agriculture, and at the offices of Customs brokers associations, transportation companies and others. The team met with the main donor agencies active in Central America, including each of the in-country USAID Missions, representatives from the World Bank, IFC, the Inter-American Development Bank and other USAID projects in each country. They also reviewed relevant documents, laws, and regulations as well as assessments and reports completed under USAID or other donor programs in recent years. In conducting the assessment, we used as a guideline the WTO Negotiating Group on Trade Facilitation's Draft Consolidated Negotiating Text document TN/TF/W/165/Rev.12 of May 8, 2012.

¹ Developing country WTO members have been encouraged to assess their trade facilitation needs and priorities and, as an integral part of the negotiations, conducted 94 national self-assessments between 2007 and 2010 with technical assistance and funding from a variety of donors and technical organizations.

After concluding the country assessments in Honduras (March 2012), El Salvador (April 2012) and Guatemala (May 2012), the BEAM project was able to identify regional crosscutting themes in the seven PTF categories. We found best practices and developments within the PTF categories in the region which can be leveraged to support similar developments in the neighboring countries. The team is using interviews conducted in the three countries, and desk research as the basis for this regional synthesis report.

Drawing from the three country assessments, the team was able to identify commonalities in some of the areas as well as disparities and various levels of development. The team also met with representatives from the main donor agencies in the region, including the World Bank and the IDB to understand their vision for trade facilitation initiatives in the region, as well as their portfolio of projects in this area. Finally, the team met with the Secretariat of Central American Economic Integration (SIECA) and discussed their initiatives for the future, in addition to key issues affecting SIECA's current operations and effectiveness.

This report focuses on giving a brief overview of the region, followed by an analysis of the regional crosscutting findings for each of the PTF areas in a comparison side-by-side chart, and includes a brief analysis of the common themes across the PTF areas. Finally, the report focuses on prioritization and recommendations for each country, with country action plans for the top priority areas in each country.

BACKGROUND

President Barack Obama's visit to El Salvador in March of 2011, followed by Secretary of State Hillary Rodham Clinton's visit to Guatemala in June of 2011 have sent a clear signal to Central America and the world that the US Government is committed to supporting the economic growth, security and prosperity of this region. After years of deadly wars and natural disasters, Central America has become one of the most violent regions of the world.² As Secretary Clinton expressed during the Central American Security Conference held June 2011 "*The turnout today is an expression of shared responsibility and a testament to the shared sense of crisis and an acute and growing concern over the violence and criminality affecting our friends and neighbors in Central America.*"³ Secretary Clinton went on to pledge \$300 million to support, among other efforts, fiscal reform and rule of law in Central America.

Consistent with this overarching objective, the US Government has brought the CAFTA-DR countries into its Pathways to Prosperity program.⁴ Pathway partner countries have committed to deepening collaboration on four pillars, the second of which is: "Facilitating trade by improving the systems, regulation, and infrastructure small firms need to trade more competitively across borders." In addition, the US signed a Partnership for Growth agreement with the Government of El Salvador in 2011, which has among its objectives to "Raise (net) tax revenues to 16 percent of GDP by 2015 and use public resources efficiently and transparently." Under this goal, the USG committed to "provide technical assistance to improve customs administration."⁵

Trade in Central America is framed within various trade agreements and regional integration documents. Central America has signed a number Free Trade Agreements (FTA) including one with the United States (CAFTA-DR) as well as numerous bilateral FTAs between CAFTA-DR members and other nations. Among the outside nations that have negotiated FTAs with Central American nations are Mexico (Guatemala, El Salvador, Honduras); Chile (all); the Dominican Republic (all); Panama (all); Colombia (Guatemala); Venezuela (Guatemala); and the European Union (all).

Central America has a wealth of regional integration documents and technical regulations that govern trade within the region. Included among these documents are the Central American Unified Customs Code (CAUCA) and its Regulations (RECAUCA), and various technical regulations. The PTF categories are governed regionally by provisions of CAUCA, RECAUCA and CAFTA-DR.

DONOR EFFORTS IN THE REGION

European Union: With an investment of €95 million, the EU's 2007-2013 regional initiatives fall under the following categories:

- I. Strengthening the institutional system for regional integration, with €15 million already invested in 2008.

² See: Padgett, Tim, TimeWorld, "*The Deadliest Zone, Hillary Clinton Visits Central America's Narco Nightmare*", at <http://world.time.com/2011/06/22/the-deadliest-zone-hillary-clinton-visits-central-americas-narco-nightmare/#ixzzIxpRP9OtH>

³ See: Secretary of State Hillary Rodham Clinton, *Remarks at the Central American Security Conference (SICA)*, at <http://www.state.gov/secretary/rm/2011/06/166733.htm>.

⁴ See: US Department of State, *Pathways to Prosperity in the Americas*, <http://www.state.gov/p/wha/rls/fs/2012/187784.htm>

⁵ Partnership for Growth, *El Salvador – United States, Joint Country Action Plan, 2011-2015*, p. 22.

2. Consolidation of the customs union and harmonization of policies, with €23.5 million invested in 2009, and another €44 million to be invested between 2010-2013.
3. Strengthening good regional governance and security, with €5.5 million invested in 2009, and another €7 million to be invested between 2010-2013.

Inter-American Development Bank: Below is a list of regional projects that the IDB is supporting or expects to support in the region.

1. Trade Facilitation and Security Standards for the Logistics Chain: Focused on implementing the AEO in the customs administrations of certain member states, by designing an AEO program that meets international standards and is compatible with other AEO programs of the region.
2. Regional Program on Pest Risk Analysis: The objectives of this project are to create and implement a Capacity Building Program in Pest Risk Analysis tailored to Latin American and Caribbean Countries needs in order to strengthen technical capacity to meet their WTO obligations; ensure that beneficiary countries are better equipped in terms of meeting the importing market's requirements; and to strengthen quarantine inspections based on a risk-assessment approach.
3. Assessment of the quarantine procedure to clear agriculture products at the border: The objective of this component is to do an assessment of the quarantine procedure to clear agriculture products at the border and to support the collection of data for the correspondent efficiency indicators of the quarantine procedures.
4. Support for AEO implementation, to facilitate trade, increase the security of the logistics chain and promote regional integration and harmonization initiatives.

World Bank / IFC: While the World Bank / IFC is defining their agenda for the region, the team met with IFC staff in El Salvador and understand that they plan to support customs reform and modernization in the following areas:

1. Single window, by supporting the vision and model, defining benchmarks and mechanisms to connect the single windows in the region. As indicated during our interview at IFC, they are aware of the work that the IDB expects to do in the region to support single window efforts, and are coordinating efforts.
2. Support for improved customs operation and model processes. The work would include support for integrated risk and control systems; support for the implementation of the AEO program in the region; and improving human resources and IT systems in the customs services of the region.
3. Support to harmonize the SPS regulations in the region to achieve mutual recognition of sanitary certificates.
4. Revision and harmonization of the trade facilitation instruments that exist in the region.

KEY FINDINGS

After conducting a three-country review, we were able to compare the stage of implementation of the WTO trade facilitation commitments under the PTF categories in El Salvador, Guatemala, and Honduras. We found commonalities across the three countries in some of the PTF categories, such as the lack of use of AR by the trade community. In other cases, we found differing levels of implementation. For example, while El Salvador has an independent Customs Court for appeals, Honduras has not yet created theirs. In the area of fines, Guatemala is new to the scene with a recent National Customs Law which, for the first time, is registering customs infractions and fines. The impact of the law has been so strong, that as of June 2012 the Guatemalan Congress had to suspend the fines for the second time, for a period of 90 days, to give the country time to adjust or reform the law if necessary. On the opposite end, El Salvador and Honduras both have a long history of fines and sanctions, and thus have other problems related to the management of fines and helping companies to become more compliant.

At the center of all the regional activity is SIECA. We looked at the SIECA website and reports to find developments in the seven PTF areas. We also met with SIECA staff. The information about SIECA projects and initiatives is hard to find and when available, is outdated. Many of the reports for express shipment initiatives, for example, are dated 2010. Because of SIECA's importance in the region, it is necessary to improve access to information on the data and projects that SIECA handles.

The table at the end of this chapter shows in a snapshot the side-by-side comparisons of levels of achievement across the countries in each of the PTF areas. The chart makes it easy to draw commonalities and regional best practices, and it clearly shows the different levels of implementation. Common threads and practices are discussed following the table.

COMMON THEMES ACROSS THE PTF AREAS

I. **Underutilized Advanced Rulings.** AR are well regulated in both regional and national instruments. Most Customs authorities are ready to issue them, and procedures are in place. However, these instruments are rarely used across the region. We found that the reasons for reticence in the Central American trade community are common to other countries who have also struggled to get buy-in and interest in this mechanism. The main reasons for their underutilization are:

- **Lack of knowledge:** traders are generally not aware that AR exist, are not familiar with their benefits, and have no understanding of how to prepare for and file AR. In most cases, Customs authorities have provided information on their websites about AR, have done seminars and have even developed easy to use forms to file for AR, but the private sector is still generally misinformed.
- **Lack of trust:** Traders have little faith in the binding nature of AR and feel that, after all the work and documents they need to file to get an AR, Customs officers at the points of inspection will not follow an AR and continue being arbitrary in their day-to-day decisions. This belief is reinforced by the general perception that Customs officers at ports, airports and border points have strong discretionary powers.

- Length of time to decide: The private sector perceives the term for Customs to issue an AR (150 days) to be excessive and feels it is impractical for them to have to foresee the types of goods they will be importing almost six months ahead of time. The 150-day term is consistent with WTO requirements, with CAFTA-DR, and with CAUCA/RECAUCA, however, the trade community is not aware that this term is standard and compliant with international requirements.

It would be useful to understand the efforts and methods other countries have used to promote the use of AR and implement similar solutions for Central America. The BEAM team understands from our interviews that traders need to see the cost benefit of filing for AR. Because this is a problem that spans across the region, it would be beneficial to do a best practices study, a cost/benefit analysis and develop an implementation plan to promote the use of AR. However, we also noted that USAID's past efforts to promote the use of AR did not produce the expected results.

2. **OCA lagging behind and disconnected.** In the areas of Internet Publications and Pre-Arrival Processing, OCA are behind Customs authorities in all the countries we visited. Trade related operations are not seen as the most important functions of Health or Agriculture agencies or the OCA, and thus there has been little government investment in automating trade related processes for these agencies.

While all the countries we visited have single windows (mostly for export), and have plans to interconnect the databases of the OCA with Customs, thereby necessarily streamlining and automating the OCA procedures for interconnection, the reality is that currently there is no data sharing between border agencies. While Customs Authorities have the mechanisms and systems in place for pre-arrival processing, the manifests and declarations are not being electronically shared with other agencies, thereby causing delays in the clearance process. A trader once said of this problem that having an automated customs and a manual OCA is like driving a sports car up to a certain part of the road, and then having to get off and continue the journey riding a donkey. Automation of OCA and interconnection/data sharing is very important and will have a significant impact on the clearance times in Central America, particularly considering the high volume of agriculture products traded in this region.

Another aspect of automation has to do with Internet Publications. While there are a few OCA that have information online about their trade related procedures, and some even have e-filing capabilities, this is not the norm. The information is scattered, hard to find, and processes are unclear. Some countries expect to solve this problem with single window portals where they hope to consolidate trade related information for all agencies in one place. However, in order to get to that stage, OCA first need support with process simplification and reengineering, and with the development of trade related procedures manuals. These can then be used as basis for a more clear and complete content on their respective websites and a future trade portal.

3. **More variety in transit guarantees.** While this is not a priority area for the region (except for Guatemala where the guarantee system recently changed) private parties in all three countries said they would like to have a "menu" of guarantees to secure payments for transit operations. There currently is a regional effort to reform the transit guarantee system in CAUCA to allow for the option of filing a global bond instead of the pledge, and all countries in the region have approved the reform with the exception of Nicaragua. It would be beneficial for a future project to support this regional initiative.

TABLE I - COMPARISON OF FINDINGS FOR THE CENTRAL AMERICAN REGION ACROSS THE SEVEN PTF AREAS

	Region	El Salvador	Guatemala	Honduras
Advanced Rulings	<ul style="list-style-type: none"> • Legislation applicable to the region: CAUCA article 72; RECAUCA articles 291 to 310; and CAFTA-DR article 5.10 • SIECA is working to develop the <i>Sistema Regional Automatizado para la Gestion de Resoluciones Anticipadas</i> • SIECA's website links to the Advanced Rulings sites of the 5 customs authorities of the region • Once inside the sites of Guatemala, Honduras and El Salvador, there is little to no information about AR • In interviews SIECA personnel said that there is very little use of AR in the region • El Salvador, Guatemala are prepared internally to implement AR and have issued AR, Honduras is lagging behind 	<ul style="list-style-type: none"> • Customs issued DACG N° DGA-015-2008 to regulate AR • AR can be filed for: <ul style="list-style-type: none"> ○ Classification ○ Customs valuation - GATT Article VII ○ Verifications of origin • Customs officers have training and there are procedures in place to manage AR • Customs has uploaded to their website forms to file AR • There have been no more than 10 AR issued since 2008 • The trade community is uninformed but interested in learning more about the AR 	<ul style="list-style-type: none"> • SAT issued an internal procedure PR-IAD/DNO-PE-08 of 2011 • AR can be filed for: <ul style="list-style-type: none"> ○ Classification, ○ Customs valuation- GATT Article VII ○ Verifications of origin • Only 3 AR have been issued • The trade community prefers to use other mechanisms such as Technical Rulings, which are faster to obtain (although they are only binding for 15 days) • They do not see the benefit of filing AR 	<ul style="list-style-type: none"> • Customs has an internal procedure (<i>Procedimiento de Resoluciones Anticipadas</i>) which is basically a step-by-step guide for customs officers to process AR, with cross references to RECAUCA • There are no guides or forms to help the public understand or use AR • DEI indicated there had been no AR request thus far • The trade community does not know about or use AR
Internet Publication	<ul style="list-style-type: none"> • There are various internet sites that contain trade related information in the region • Aside from the local websites, regionally, there is the SIECA site, the sites of the various donors who work with SIECA, and a site for SICA, among others • The information in SIECA's website concerning trade facilitation efforts is outdated – newsletters date 2010 	<ul style="list-style-type: none"> • El Salvador Customs has published trade-related information on the Ministry of Finance's page http://www.mh.gob.sv/ • Parties can access Customs legislation organized by type of document and per year, as well as Customs' automated system • The country has many other websites with trade related information • The Ministry of Agriculture 	<ul style="list-style-type: none"> • Customs' publications are available in SAT's website www.sat.gob.gt • SAT has easy to access customs information, including laws, regulations and guides • The Ministry of Agriculture and Livestock has information and regulations and it is possible to download forms • It is not possible to apply online for SPS permits and send other documents virtually 	<ul style="list-style-type: none"> • Honduras publishes customs related provisions on the website of the Executive Directorate of Income: www.dei.gob.hn • On this page, there is an easy-to-find link to Customs related material • The Secretary of Agriculture and Livestock publishes requirements and forms needed to file for and obtain sanitary permits on their website

	Region	El Salvador	Guatemala	Honduras
	<ul style="list-style-type: none"> • It is hard to navigate the SIECA website and find relevant information • It is hard to understand all the SIECA initiatives and harder to find work products from the many cooperation agreements and projects with SIECA • We could not find a website for the Regional Commission for Trade Facilitation (COFACECA) • Many tools developed with foreign aid, such as GEDOEL or 6 customs virtual training modules, are not used 	<p>(MAG) has links in their website to file for SPS certificates and obtain import permits online</p> <ul style="list-style-type: none"> • OCAs have little trade related information • Other interesting sites which add transparency to government operations include e-Regulations El Salvador and the Fiscal Transparency Portal • The country has an Exports Single Window which facilitates the filing for export related permits/certificates, however, behind the scenes the databases of the agencies are not connected 	<ul style="list-style-type: none"> • The Ministry of Health does not participate in the single window for exports • The Exports Single window connects most of the authorities, but there is still little data sharing and no imports single window 	<p>http://www.senasa-sag.gob.hn/</p> <ul style="list-style-type: none"> • However the page contains very basic information and there is little to no training or guidance available for the private sector • There is no connection between SENASA's site and database with DEI
Expedited Shipments	<ul style="list-style-type: none"> • "Urgent Shipments" are regulated in article 110 of CAUCA. RECAUCA regulates express shipments and couriers in articles 563-577. CAFTA-DR regulates express shipments in articles 5.2 and 5.7 • As of the end of 2010, under the SIECA-USAID cooperative agreement, the countries had agreed to do a best practices study of the express shipment automated systems of the region, and develop an automated system for the region • The next steps included adapting the systems of the countries to the model, implementing the model in at least 2 countries, and completing training sessions in these countries 	<ul style="list-style-type: none"> • Article 11-A of the Customs Simplification Law regulates express shipments • Express shipments are on average cleared in 18 hours which is above El Salvador's international commitments • In the best scenarios, courier shipments clear in under 4 hours, in the worst, in up to a month (very rare cases) • Couriers suffer from lack of space and staff at the airport • El Salvador has a very strong courier private sector entity which is diligent about communicating with the government and proposing / obtaining solutions 	<ul style="list-style-type: none"> • Guatemala is one of the most advanced countries in Latin America for expedited shipment processing, and has an operating model that was presented as a case study to the WCO due to its functional excellence • There is good communication between the public and private sector/courier companies • While the new National Customs Law had a negative impact on clearance times due to the adjustment at Customs to its provisions, by May 2012 courier companies were clearing in under 6 hours • The courier manifest is sent electronically prior to arrival, and payment is also done electronically prior to arrival 	<ul style="list-style-type: none"> • Courier companies are not electronically linked to the Customs system, and do not transfer the information electronically • DEI is working on a simplified procedure for express shipments • The new rules will facilitate the clearance of express shipments via a procedure that uses a simplified declaration • Courier companies stated that in general the system works and they are clearing express shipments in less than six hours

	Region	El Salvador	Guatemala	Honduras
	<ul style="list-style-type: none"> There has not been significant advance in this work since the end of 2010 			
Penalties	<ul style="list-style-type: none"> The issue of penalties is reserved to each member State 	<ul style="list-style-type: none"> El Salvador has a Special Law for Sanctioning Customs Infractions approved via Legislative Decree No. 551 of 2001 The Law defines sanctions for administrative, tax and legal infractions The Sanctions Law describes the procedures that apply to managing and imposing sanctions, as well as the defense mechanisms available to alleged offenders to challenge sanctions The biggest issue in the area of fines for customs is the management of the many small administrative fines (US\$50) which cost the administration more to manage them than the value of the fine The same administrative fines are an issue for the private sector who feels these fines cause unnecessary delays and are used for customs to increase collections and not to promote compliance 	<ul style="list-style-type: none"> Fines are regulated by the National Customs Law issued March 12, 2012 It has a clear definition of customs infractions and the corresponding fines The Law contains detailed procedures to apply the sanctions It does not contain procedures to dispute the fines and penalties This instrument brings Guatemala into compliance with its international commitments to have a clear system of customs infractions and fines The trade community is very displeased with the new law and particularly the sanctions and fines The private sector feels many fines are excessive for the type of infraction As a result of the push-back from the private sector, Congress temporarily suspended some of the fines until June 2012 Congress extended the suspension of the fines for another 90 days in June 2012 	<ul style="list-style-type: none"> Customs infractions are typified and regulated by a set of guidelines called the Instructivo para la Aplicacion de Sanciones por Infracciones Aduaneras (the "Fines Manual") The Fines Manual details the types of conducts that are subject to fines, distinguishes between administrative and tax infractions and imposes fines The trade community strongly argues that the Fines Manual does not have legal basis because it contradicts the constitutional mandate that states that fines and infractions must be regulated by a law, not by decree The trade community feels the Fines Manual has become an instrument of extortion and that fines are not commensurate with the degree of severity of the breach In many cases they would rather make illegal payments and bypass the fine
Appeals	<ul style="list-style-type: none"> The appeals process is regulated by Title VIII of RECAUCA There is no information on the SIECA website about regional initiatives to improve the 	<ul style="list-style-type: none"> Appeals are regulated by articles 45 and following of the Sanctions Law The Sanctions Law regulates various types of petitions 	<ul style="list-style-type: none"> Guatemala does not have a separate process for appeals, and applies RECAUCA directly Per those provisions, private parties have the right to file 	<ul style="list-style-type: none"> Honduras has a Law on Administrative Procedures (Decree 152-87) which regulates the petition and procedures available to all private parties to

	Region	El Salvador	Guatemala	Honduras
	customs appeals processes	<ul style="list-style-type: none"> • The Reconsideration Petition is used to request that the Customs Administrator who issued an administrative ruling reconsider the decision • The Revision Petition is filed directly before the Customs General Director. This is a petition to request a revision of the decision issued by the Customs Administrator • Parties can appeal the decisions of Customs before the Administrative Court of Internal Taxes and Customs (<i>Tribunal de Apelaciones de los Impuestos Internos y de Aduanas - TAIIA</i>) • The TAIIA is an entity of the MOF, but it is administratively separate from the Customs Authority • The staff of the Court is not Customs staff, and Customs has no direct connection with TAIIA • Appeals mechanisms are used frequently, mostly to dispute classification and value decisions • The Reconsideration Petition is hardly used, but the Revision Petition is widely filed • 40% (of an average 450 cases) of TAIIA workload is customs related • OCA: There are virtually no petitions filed against the Ministry of Agriculture's decisions for international trade matters (such as denial of a 	<ul style="list-style-type: none"> administrative petitions against SAT, the first ruling is made by the head of SAT • Thereafter parties can appeal Customs' decisions before the Customs Court • The Customs Court is one of the functions of the Directorate of SAT • There is no fixed court personnel; it is really the same directors of SAT playing the role of administrative court • While in theory there is a Customs Court, the court is not independent from the Customs Administration • The private sector has little faith in the appeals system and rarely makes use of this mechanism • OCA: as with other countries in the region, we found that petitions are rarely used because the administration takes too long to decide, traders have no trust in the system, and they would rather make whatever amendments the administration requires than dispute a decision 	<ul style="list-style-type: none"> counter Customs decisions • Parties have various administrative petitions available which have to be filed and denied prior to proceeding with a judicial appeal • Honduras applies the provisions of Title VIII of RECAUCA • Honduras has not complied with RECAUCA articles 630 and following, which regulate the creation and operation of the Customs Court • It should have created this Court in 2008, but has repeatedly asked for extensions and does not currently have plans or funding to create the Customs Court • The appeals process for customs is incomplete, not trustworthy and inefficient • OCA: the Law on Administrative Procedures applies to the decisions of all other agencies • Petitions are rarely used and in most cases traders prefer to either accept the decision or circumvent it, perhaps by making illegal payments

	Region	El Salvador	Guatemala	Honduras
Pre-Arrival Processing	<ul style="list-style-type: none"> The issue of pre-arrival processing is reserved to each member State 	<p>certificate)</p> <ul style="list-style-type: none"> Declarations and manifest can be sent electronically to customs prior to arrival This information is not received electronically prior to arrival by other authorities, including the port operator The trade community agrees there are no major issues with the electronic transmission of documents prior to arrival There is little data sharing or interconnection between customs and the other authorities, however, there are plans to make this a reality once the single window for imports is a reality (mid 2013) 	<ul style="list-style-type: none"> Guatemala allows importers to send the manifest, consolidated courier manifest and the declaration to SAT prior to arrival There is currently no pre-arrival processing for OCA Both the private sector and SAT indicated that there are no major issues with the electronic transmission of documents prior to arrival The Ministry of Agriculture indicated they have no way of doing pre-arrival processing because they have very little automation The same is the case with the other authorities at the points of entry There are plans to develop the single window for imports and interconnect authorities IT systems, but development in this area is stalled due to the focus on the new National Customs Law 	<ul style="list-style-type: none"> Manifests and declarations can be sent prior to arrival using the country's customs IT system (SARAH) Although the system generally works well, there are many times when the system is offline causing delays in operations Courier companies requested that the consolidated manifest be added to the documents that can be sent electronically prior to arrival Pre-arrival processing is not currently available for Agriculture and Health agencies
Transit Guarantees	<ul style="list-style-type: none"> Regionally, Transit Guarantees are regulated by Resolution No. 61-2000 of the COMIECO (Oct. 2000) as modified by the Resolution 65-2001 COMRIEDRE (March 2001) These establish the procedures applicable to transit customs operations, as well as the obligations and responsibilities 	<ul style="list-style-type: none"> Guarantees are created via bonds on the mode of transportation (as provided by regional instruments) There were no major concerns in this area, but the private sector would like to explore the possibility of adding other forms of guarantees 	<ul style="list-style-type: none"> Regulated via the new National Customs Law It provides that parties must either purchase an insurance policy or make cash deposits to secure unpaid duties and taxes This is the second most controversial provision of the National Customs Law Because of the newness of the 	<ul style="list-style-type: none"> Honduras also applies RECAUCA and orders pledges on the mode of transportation as a guarantee When discussing transit guarantees with the private sector, including transportation companies, they indicated that the system worked and they had no major concerns

	Region	El Salvador	Guatemala	Honduras
	<p>of carriers</p> <ul style="list-style-type: none"> • According to article 29 of Resolution 65–2001 of COMIECO, the mode of transportation is given in pledge as guarantee of Customs duties and taxes in the case of transit operations when moving goods between Customs territories within the region • There currently is a regional effort to reform the transit guarantee system in CAUCA to allow for the option of filing a global bond instead of the pledge • All countries in the region have approved the reform with the exception of Nicaragua 		<p>Law, there is a lot of confusion and lack of clarity concerning the new mechanisms for transit guarantees</p> <ul style="list-style-type: none"> • Insurance companies are developing instruments for these new policies and are generally charging 0.45% of the unpaid amounts per each movement of the cargo 	

PRIORITIZATION AND RECOMMENDATIONS BY COUNTRY

Using the information gathered during the three country assessments, the team was able to identify PTF priority areas for support in each of the countries. These are identified in a graphic and a table below. We have also included a table showing the priorities per country as well as a section with the rationale we used for our rankings. Finally, we are including sample work plans and cost for each of the four High Priority / High Impact areas.

FIGURE I - PRIORITIZATION OF NEED AND IMPACT BY COUNTRY

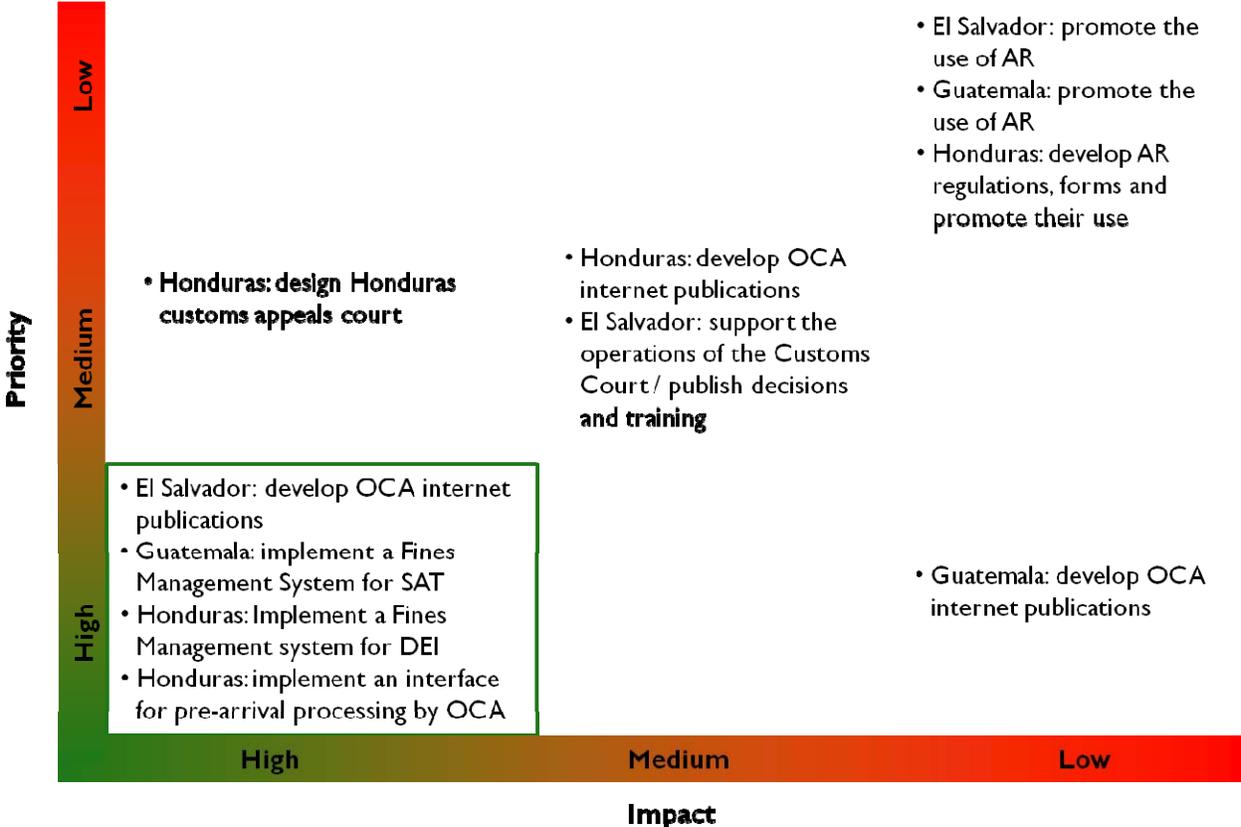


TABLE 2 - PRIORITIZATION AND RECOMMENDATIONS – PTF AREAS FOR: EL SALVADOR, GUATEMALA AND HONDURAS

	El Salvador	Guatemala	Honduras
Advanced Rulings	Low Impact / Low Priority: implement an AR promotion campaign.	Low Impact / Low Priority: implement an AR promotion campaign.	Low Impact / Low Priority: (1) develop an official regulation for AR (currently there is only an internal DEI document); (2) develop a guide for the private sector to understand and use AR; (3) develop and upload to the DEI site easy to use forms (suggest using as model the El Salvador regulation and forms); and (4) implement an AR promotion campaign.
Internet Publications	High Impact / High Priority: (1) in coordination with the Central Bank's single window plans, help develop the Internet Content of certain selected OCA (suggest working with Agriculture first – which is in stage 3 for the Single Window for Imports expected for 2014 and is urgently needed above other OCA due to the extent of agriculture trade in the region); (2) upload the content for the Internet Content potentially to the CIEX website; (3) promote the site; (4) link the site to the SIECA portal; (5) link the site to the sister sites of other countries in the region.	High Impact / Low Priority: (1) in coordination with Agexport's single window, help develop the Internet Content of certain selected OCA (suggest working with Health and Agriculture first); (2) identify the best portal for the consolidated content of trade related internet publications of SAT and OCAs, and upload the content to one portal; (3) promote the site; (4) link the site to the SIECA portal; (5) link the site to sister sites in the region.	Medium Impact / Medium Priority: (1) in coordination with the IDB single window project, help develop the Internet Content for Health and Agriculture; (2) identify the best portal for the consolidated content of trade related internet publications of DEI and OCAs, and upload the content to one portal; (3) promote the site; (4) link the site to the SIECA portal; (5) link the site to sister sites in the region.
Expedited Shipments	Not priority for this country at this time.	Not priority for this country at this time.	Not priority for this country at this time.

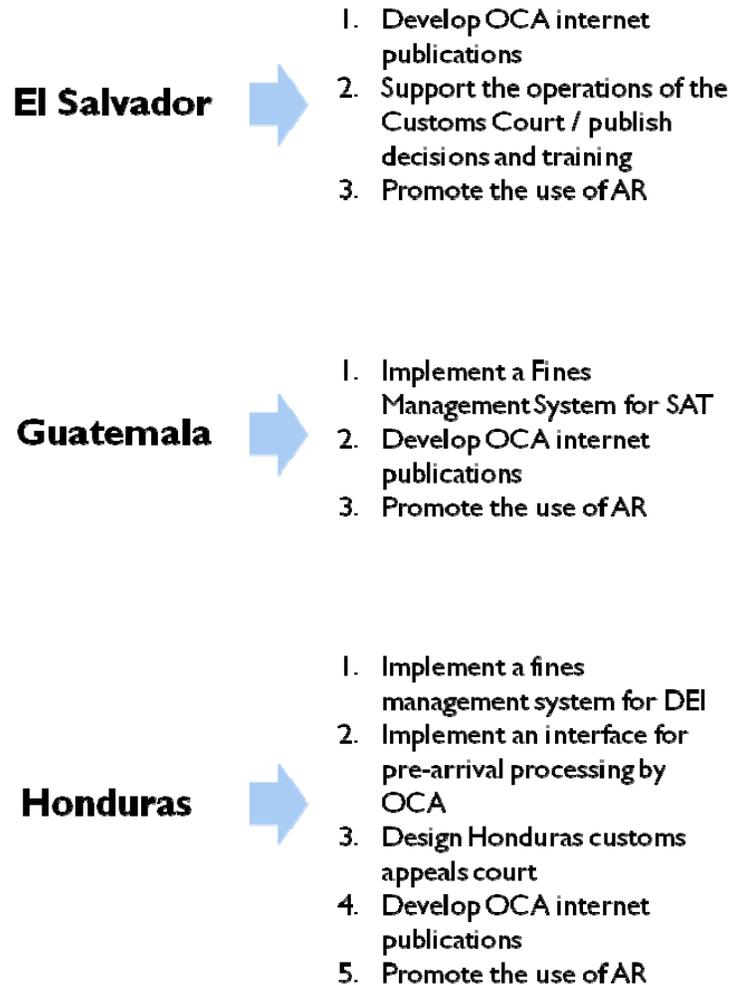
	El Salvador	Guatemala	Honduras
Penalties	Not priority for this country at this time.	High Impact / High Priority: (1) Develop a fines and infractions management system for SAT including: (a) processes, manuals with process maps, (b) relevant IT modules if possible integrated to the customs IT system, (c) training of SAT staff; ⁶ (2) help increase company compliance and help companies prepare for the new fines system by developing training and workshops about the new regulations, and using the experience of El Salvador and Honduras to determine the main causes of infractions to tailor the training; (3) help SAT develop a scoring system for companies and brokers based on level and type of infractions (suggest looking at the El Salvador customs model); and (4) use this monitoring system to help increase compliance and feed activity 2.	High Impact / High Priority: (1) Develop a fines and infractions management system for DEI including: (a) processes, manuals with process maps, (b) relevant IT modules if possible integrated to the customs IT system, (c) training of DEI staff, (d) internal publication of criteria to reduce discretionary decisions from DEI staff when applying a fine; (2) help increase company compliance; (3) help DEI develop a scoring system for companies and brokers based on level and type of infractions (suggest looking at the El Salvador customs model); and (4) use this monitoring system to help increase compliance and feed activity 2.
Appeals	Medium Impact / Medium priority: (1) help develop the IT modules or software necessary to publish the decisions of the TAlIA on their website; (2) support TAlIA by creating linkages to other customs courts and the WCO to help further develop the Court's customs criteria / establish a system of ongoing training for court staff on the most relevant customs related matters based on an analysis of the most common cases.	Not priority for this country at this time.	Medium Impact / High priority: (1) help design the customs court for Honduras including: (a) administrative adscription; (b) organizational structure; (c) processes; (d) staffing including skill-set and selection of the first members of the court; (e) sources of funding; (2) develop an implementation plan; (3) define how much can be implemented given project funds.

⁶ Although certain fines have been suspended, the GOG intends to implement customs sanctions at some point, so increasing company compliance and helping traders be ready for a system of fines will not be a lost investment.

	El Salvador	Guatemala	Honduras
Pre-Arrival Processing	Not priority for this country at this time.	Not priority for this country at this time.	High Impact / High Priority: (1) in coordination with the IDB Single Window and trade projects, design and implement an interface software at the Secretary of Agriculture and DEI to allow the transmission of the electronic manifests and declaration from DEI to Agriculture at the same time DEI receives them in their system. ⁷ (2) If funds are available, add Health interconnection to the interface; and (3) train government staff as well as the private sector.
Transit Guarantees	Not priority for this country at this time.	Not priority for this country at this time.	Not priority for this country at this time.

⁷ The work would use as a model the IT software designed for USAID El Salvador's Customs and Business Environment Project to develop the interface between customs and the port operator (CEPA) to allow customs to transmit the e-declarations and manifests to the port operators' IT system upon transmission to customs.

FIGURE 2 – PRIORITIZATION AND RECOMMENDATIONS: PTF AREAS PRIORITIES PER COUNTRY



RATIONALE

1. **Advanced Rulings:** The team gave AR a rating of low priority and low impact for El Salvador and Guatemala because both these countries have systems in place, training and experience issuing AR. Although their use is not extensive, the only true need is for the promotion of AR to help the trade community make use of this instrument. For Honduras, the project is also giving this area a rating of Low Priority and Low Impact, although the team identified that Honduras needs to do more work in the area of developing regulations, processes, easy to use guides and forms to help the private sector have better access and knowledge of these tools. Regardless, we still feel that given Honduras's other needs AR is not a priority area. Finally, we also gave this low level of importance to the AR across the board because previous USAID efforts in the region to support the use of AR have not borne fruit, mostly because countries had other priorities. USAID Regional Mission is not inclined to focus efforts in this area at this time.
2. **Internet Publications:** The rankings in this case differ from country to country for various reasons.

- a. In the case of El Salvador, we found support in this area to be of **High Impact and High Priority**. This is a country that has shown great progress in the modernization of customs operations, and, although the Customs website is not the easiest to navigate, it has sufficient information, along with an easy to follow Customs Guide developed with USAID support. However, the OCA are lagging behind and there is little information available online about import and export procedures for these other agencies. There are currently efforts in El Salvador to develop a Single Window for Imports, which will have in a single portal all the trade related information for Customs and OCA. However, the plans to implement this Single Window divide the work in 3 phases, with the first one interconnecting Customs and Health towards the middle to end of 2013. Agriculture will not be added until a phase 3, and the Central Bank (who administers the Single Window) acknowledges they do not have funds for stages 2 and 3 at this time, and it will take 2 to 3 years to focus on the connections between Agriculture and Customs. Given the importance of agriculture imports / exports in the region, the project feels that developing internet content for Agriculture is a priority area with high impact potential. The work on this country would be done in coordination with the Single Window efforts, and would serve as a basis to help launch the Agriculture / Customs interconnection in the future. If funds are available, the project recommends that the next OCA to receive support for internet publications be the Ministry of Health.
 - b. In the case of Guatemala, we are giving this area a ranking of **High Impact / Low Priority**, because we feel that working to develop and publish internet content for the OCA, particularly Agriculture, has the same importance stated above for El Salvador. Guatemala has high levels of trade in the agriculture sector, but the relevant authority has already developed some internet content, and, mostly due to the enactment of the new National Customs Law, this area is superseded in priority by the PTF category of Penalties. However, if the project had sufficient funds to support Fines and another area, we would recommend working to develop the Internet Publications of Agriculture and Health to be second in line.
 - c. In Honduras support for Internet Publications received a **Medium Impact / Medium Priority** ranking, mostly given the many other activities that are necessary in Honduras. Honduras is the country that received the most recommendations, which is a clear reflection of the fact that Honduras trade system is in bad need of support. Honduras has 2 IDB projects in place, with one supporting the Single Window for imports. Accordingly, we are recommending that the project focus on developing the internet content for OCA, but only after focusing on other High Priority areas, and looking at the other Medium Priority and Impact areas identified for this country.
3. **Expedited Shipments:** Taking into consideration that the three countries have mostly effective clearance processes for expedited shipments, we did not feel this was a priority area for any of the countries. Guatemala has one of the most advanced expedited shipment operating models in Latin America. In Honduras, expedited shipments are generally cleared in under 6 hours. El Salvador is lagging behind its neighbors in this area, with clearance in an average 18 hours. However, we still consider this a non-priority area for El Salvador because: (a) there are positive efforts underway locally led by the Association of Courier companies to reform Article 11-A of the Customs Simplifications Law which governs expedited shipments and improve the clearance process; and (b) because the previous regional and bilateral USAID customs projects have provided support for improving expedited shipments, and support for OCA is priority in this country.

4. Penalties:

- a. **Guatemala:** This is an area of **High Impact** and **High Priority** for Guatemala. As indicated in the country report, Guatemala's new National Customs Law regulates customs infractions and penalties for the first time in the country's recent history. As a result, SAT is called to design and implement processes to manage fines, as well as to train their staff and develop IT systems to support fines management. Although there are currently disputes about the amount and proportionality of the fines proposed in the Law, and most of the penalties section of the Law is currently suspended, we understand that the Government of Guatemala is adamant about implementing a customs sanction system and that SAT needs to be prepared to manage fines and penalties. We feel this is a priority area and support will have an immediate and high impact in the country.
 - b. **Honduras:** In Honduras there are ongoing disputes about the legality of the document that created customs infractions and penalties.⁸ However, a key issue identified by the DEI and the trade community is that fines are not achieving their goal of increasing compliance, and on the contrary, are being used to "extort" the private sector. The project feels that it is necessary to increase company compliance to help traders, and particularly their customs brokers, change the conducts that are generating sanctions. Since DEI has a database of infractions, it is necessary to look into the data, understand the main infraction areas, and support companies and brokers with training. In addition, DEI staff also needs training in order to harmonize criteria and reduce the cases of discretionary application of fines. Ideally, it would be beneficial for the country to develop a fines management module for the Customs IT system (SARAH) that would take the discretion away from the officers at the points of entry. Because this is an important issue for the trade community and it can have an impact on reducing corruption, we have given this area a **High Priority and High Impact** ranking, second only to the High Priority area of Pre-Arrival Processing. If there are sufficient project funds, we would recommend this as a second area of focus for Honduras.
5. **Appeals:** In this area, the three countries are at three different levels of development. El Salvador is at the forefront with a fully operational and independent Customs Court. Guatemala has a Customs Court in paper, but not independent (part of the SAT)⁹ and hence, not deemed trustworthy by the trade community. Finally, Honduras has no Customs Court and has no plans to develop one. All three countries have various levels of administrative appeals with different types of petitions that can be filed. Our reports indicate that the community does make use of the appeals mechanisms.
- a. For El Salvador, we gave support in this area a ranking of **Medium Impact/Medium Priority** because the country already has a Customs Court in place, which is deciding approximately 200 customs related appeals per year. However, the decisions of the Court are not published online. In addition, due to the very technical nature of customs matters addressed to the Court, interviewees said that many cases are not decided on the merits of the case but on formalities. The Court specifically asked for support to help train their staff and develop technical criteria that would help them issue better decisions.
 - b. In Honduras, as mentioned above, there is no Customs Court. The trade community has no trust in the appeals system and does not feel that they have an avenue to exercise their

⁸ Please refer to the Honduras Report.

⁹ Please refer to the Guatemala Report.

rights. This is a **High Priority** area for Honduras, but we feel it has **Medium Impact** due to the amount of funding needed to implement a Customs Court and the time it would take to educate the trade community to use and trust the system. This area would need a large influx of funds to be able to cause higher impact at this time.

6. **Pre-Arrival Processing:** All three countries in general have good customs IT systems in place to receive electronic manifests and declarations. However, OCA are not actively receiving documents prior to arrival and hence, cannot do any pre-arrival processing. We did not feel, however, that this was a priority area for El Salvador or Guatemala due to other concerns and because both countries are generally clearing ordinary cargo without much delay. However, in Honduras, support to help the OCA receive and process information prior to arrival can have a positive impact on the country's clearance process. The IDB is working to develop a Single Window, and we would recommend working in coordination with them to find specific areas where USAID can provide support. We understand from our interviews that IDB will focus more on the processes reengineering side, and developing a communication and data sharing interface would complement some of their expected work. Because of the potential impact on clearance processes, the importance of Agriculture trade to the country, we feel this is a **High Impact / High Priority Area** for Honduras.
7. **Transit Guarantees:** While there is some interest among the trade communities of the three countries in having more types of guarantees available to secure the payment of duties and taxes in the case of temporary imports, this was not identified as a priority area for any country, including Guatemala where the system in place of insurance policies is brand new.

COUNTRY ACTION PLANS HIGH PRIORITY / HIGH IMPACT AREAS

I. El Salvador: Develop Trade Related Internet Publications for the Ministry of Agriculture (extend to Health if possible)			
Activities	Level of Effort (some are parallel)	Staffing	Expected Outputs
a. Map the trade related processes of the Ministry of Agriculture that interface with the trade community	60 days	Project Staff: Trade or communications specialist / local web developer - IT specialist GOES Support: Agriculture staff, Central Bank-Single Window Staff, Customs, PROESA, EXPORTA staff	Relevant process maps
b. Develop easy to understand internet content with import, export and transit procedures (write-ups, case studies, examples)	120 days		Draft Internet Content
c. Develop easy to use forms for import, export and transit procedures – define the possibility and cost of e-filing capabilities	15 days		Relevant forms
d. Discuss the internet content with other GOES agencies	15 days		Meeting notes with comments to Internet Content and Forms
e. Identify best location for content (virtual location) and seek relevant GOES approval	10 days		Concept paper for website design or location
f. Roundtable discussions with private sector and obtain feedback	30 days		Meeting notes with comments to Internet Content and Forms
g. Develop final content considering GOES and private sector feedback	10 days		Final Internet Content
h. Upload content to pilot site	5 days		Test web-content
i. Pulse check for customer satisfaction with site and content, make changes and upload final content	30 days		Final web-content
j. Link site to GOES sites, other countries ' relevant sites and SIECA website	15 days		Uploaded links

Expected investment: Approximately: \$300,000.

2. Guatemala: Fines and infractions management system for SAT			
Activities	Level of Effort (some are parallel)	Staffing	Expected Outputs
a. Benchmark study to determine the processes and systems they currently have in place if any	30 days	Project Staff: Customs specialist / local customs expert / IT specialist GOG Support: SAT staff	Inception legal requirements and best practices report
b. Identify processes required by local law, CAUCA, RECAUCA and CAFTA if any	15 days		Inception legal requirements and best practices report
c. Identify and document relevant best practices	30 days		Inception legal requirements and best practices report
d. Design fines and infractions management system including: processes maps, operation manuals, proposed organizational structure, proposed staffing requirements with skill-sets, proposed IT solution	120 days		Fines Management System design
e. Discuss design with GOG stakeholders	15 days		Meeting notes with comments on current/inception requirements, best practices report and design
f. Develop implementation plan	30 days		Implementation Plan
g. Contingent on project funds, launch implementation	TBD		Status reports

Expected investment: Approximately: \$300,000.

3. Honduras: Fines and infractions management system for DEI			
Activities	Level of Effort (some are parallel)	Staffing	Expected Outputs
a. Benchmark study to determine the processes and systems they currently have in place – include port / border points and their part in the fines process	60 days	Project Staff: Customs specialist / local customs expert / IT specialist GOH Support: DEI staff	Inception legal requirements and best practices report
b. Identify processes required by local law, CAUCA, RECAUCA and CAFTA if any (same with Guatemala work for regional data and laws)	15 days		Inception legal requirements and best practices report
c. Identify and document relevant best practices (same for Guatemala / no duplication)	30 days		Inception legal requirements and best practices report
d. Design fines and infractions management system including: processes maps, operation manuals, proposed organizational structure, proposed staffing requirements with skill-sets, proposed IT solution	120 days		Fines Management System design
e. Discuss design with GOH stakeholders	15 days		Meeting notes with comments on inception requirements, best practices report and design
f. Develop implementation plan	30 days		Implementation Plan
g. Contingent on project funds, launch implementation	TBD		Status reports

Expected investment: Approximately: \$300,000.

4. Honduras: Pre-Arrival Processing Software Interface – For Agriculture (if possible add Health or OCA)			
Activities	Level of Effort (some are parallel)	Staffing	Expected Outputs
a. Develop benchmark analysis with mapping of relevant agriculture systems and customs (DEI) systems	60 days	Project Staff: IT specialist / Project Manager GOH Support: DEI staff, Agriculture staff	Inception report with maps
b. Definition of best solution for Honduras (develop an interface to have DEI send the e-documents to Agriculture or have documents sent directly to Agriculture, etc.)	60 days		Solutions proposal
c. Discussion of solutions with stakeholders	15 days		Meeting notes with comments
d. Develop technical specifications to develop the information sharing interface and implementation plan	30 days		Technical specifications document with proposed solution and implementation plan
e. Launch implementation	120 days		Progress reports
f. First capture of pre-arrival documents by Agriculture			Progress reports
g. Staff training	60 days		Training modules and attendance report
h. Awareness campaign for trade community (if necessary)	15 days		Campaign and client feedback

Expected investment: Approximately: \$300,000.

Total Suggested Per Country Investment	
El Salvador	\$300,000
Guatemala	\$300,000
Honduras	\$600,000