



Mid-Term Performance Evaluation of the Bangladesh Trade Facilitation Activity

January 2018

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MID-TERM PERFORMANCE EVALUATION OF THE BANGLADESH TRADE FACILITATION ACTIVITY

Contract No. AID-388-C-14-00001

Accelerating Capacity for Monitoring and Evaluation (ACME)

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CONTENTS

ACRONYMS..... iv

EXECUTIVE SUMMARY 1

EVALUATION PURPOSE & QUESTIONS 6

PROJECT BACKGROUND..... 7

EVALUATION METHODS & LIMITATIONS 8

FINDINGS, CONCLUSIONS AND RECOMMENDATIONS 9

 Evaluation Question 1: IR 1 9

 1. Website and National Enquiry Point: Trade-related aspects..... 9

 2. Website and National Enquiry Point: Information Technology Aspects 10

 3. Advance Rulings 11

 4. Enhanced Customs Auction Procedures 11

 5. Non-Tariff Barriers To Agricultural Imports..... 13

 6. Standard Operating Procedures, Statutory Regulatory Orders, Instructions, Guidelines, & Manuals..... 14

 7. Brokers’ Licensing Procedures..... 15

 Evaluation Question 1: IR 2..... 15

 1. Implementation of the authorized economic operators program..... 15

 2. Pre-arrival processing 16

 3. Domestic transit 17

 4. Risk management system..... 18

 5. Courier services 19

 6. Customs trade intelligence capacity..... 20

 7. Post-clearance audit system 20

 8. Customs-business partnerships..... 21

 Evaluation Question 1: Cross-Cutting Issues (Gender)..... 21

 Question 1: Summary of findings, conclusions and recommendations..... 21

 Evaluation Question 2:..... 23

 Evaluation Question 3:..... 24

 Evaluation Question 4:..... 27

 Evaluation Question 5:..... 27

LESSONS LEARNED 32

 ANNEX 1: Evaluation Methodology..... 33

ANNEX 2, PART 1: Questionnaire for Government Officials – National Board of Revenue.....	40
ANNEX 2, PART 2: Questionnaire for Government Officials	45
ANNEX 2, PART 3: Questionnaire for Private Sector Beneficiaries – Individual, Small, Medium, and Large Businesses and Chambers of Commerce	46
ANNEX 2, PART 4: Questionnaire for USAID	48
ANNEX 2, PART 5: Questionnaire for Shipping Companies, Including Expedited Courier Shippers and Customs Brokers	49
ANNEX 2, PART 6: Self-Assessment Questionnaire – BTFA Staff	50
ANNEX 3: List of Interviewees	51
ANNEX 4: Technical Aspects of BTFA Activities.....	62
ANNEX 5: Scope of Work.....	68
ANNEX 6: Bibliography.....	81
ANNEX 7: Team Composition and Conflict of Interest Forms.....	84

ACRONYMS

ACME	Accelerating Capacity for Monitoring and Evaluation
ADB	Asian Development Bank
AEO	Authorized Economic Operator
AMEG	Asia and Middle East Economic Growth
AR	Advance ruling
ASYCUDA	Automated System for Customs Data
BBIN-MVA	Bangladesh-Bhutan-India-Nepal Motor Vehicle Agreement
BCA	Bilateral cooperation agreement
BCC	Bangladesh Computer Council
BSTI	Bangladesh Standards and Testing Institute
BTFA	Bangladesh Trade Facilitation Activity
CAPTCHA	Completely Automated Public Turing Test to Tell Computers and Humans Apart
CHC	Customs House Chittagong
CDCS	Country Development Cooperation Strategy
CID	Customs intelligence database
CMS	Case Management System
COR	Contracting officer's representative
COC	Chamber of Commerce
CSV	Comma-separated values
DCH	Dhaka Customs House
DO	Development objective
DT	Domestic transport
FAQ	Frequently asked question
FTF	Feed the Future
GDP	Gross Domestic Product
GIZ	German Corporation for International Cooperation
GOB	Government of Bangladesh
IBTCI	International Business & Technical Consultants, Inc.
IP	Implementing partner
IR	Intermediate result
IT	Information technology
JBP	Joint border post
KI	Key informants
MOC	Ministry of Commerce
MRA	Mutual recognition agreement
NBR	National Board of Revenue
NEP	National Enquiry Point
NSW	National Single Window
NTB	Non-tariff barrier
OECD	Organization for Economic Co-operation and Development
PAP	Pre-arrival processing
PCA	Post-clearance audit
PNB	Pocket notebook
PS	Private sector
RKC	Revised Kyoto Convention
RM	Risk management
SAARC	South Asian Association for Regional Cooperation

SAFE	Framework of Standards to Secure and Facilitate Global Trade
SBC	Small Business Centers
SEO	Search engine optimization
SO	Statutory order
SOW	Scope of work
SOP	Standard operating procedure
SRO	Statutory regulatory order
TFA	WTO Trade Facilitation Agreement
TO	Task order
UNCTAD	United Nations Conference on Trade and Development
UNECE	United Nations Economic Commission for Europe
USAID	United States Agency for International Development
VAT	Value Added Tax
WB	World Bank
WCO	World Customs Organization
WP	Work plan
WTO	World Trade Organization

EXECUTIVE SUMMARY

EVALUATION PURPOSE

The United States Agency for International Development (USAID)/Bangladesh contracted International Business & Technical Consultants, Inc. (IBTCI), through the Accelerating Capacity for Monitoring and Evaluation (ACME) activity contract (AID-388-C-14-00001), to conduct a mid-term performance evaluation of the Bangladesh Trade Facilitation Activity (BTFA) to assess the extent to which it is on track to meet its overall performance goals and to inform management of any challenges or opportunities that warrant adjustments to ensure the achievement of those results.

PROJECT BACKGROUND

BTFA is a five-year activity, which began in September 2013 and is scheduled to end in September 2018. BTFA's objective is to bolster economic growth and food security by creating greater efficiency in cross-border trade and enhancing market access by reducing custom clearance time and costs. BTFA's scope of work also comprises cross-cutting activities, including promoting the private sector, enhancing gender awareness, and estimating "monetization" (i.e., projecting the estimated economic impact)¹ of BTFA-supported trade facilitation measures.

EVALUATION METHODS

The evaluation team relied on review of background and activity documents, as well as information-gathering questionnaires and discussions with implementers, their counterparts, and other interested parties.

FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

Question 1: *To what extent is the Bangladesh Trade Facilitation Activity on track, in terms of progress and outcomes, to meet its overall objective?*

Findings: The period of this evaluation covers from Year 1 (September 2013) to the second quarter of Year 4 (March 2017), corresponding to approximately three and one half years of activity. After delays in achieving its benchmarks, BTFA gained momentum in 2016. BTFA staff cited the long delay in the formation of three National Board of Revenue (NBR) working groups, and delays in approval by the Ministry of Finance (Economic Relations Division) of short-term technical assistance and, specifically, third-country national consultants as causes for the earlier shortfalls in meeting benchmarks.

The recent momentum has yielded limited success that is reflected mostly in the completion and launch of the enhanced Customs website (website) and National Enquiry Point, a website portal. In addition, forward momentum includes implementation of the advance rulings program and progress on the Authorized Economic Operator program. BTFA also has taken steps to promote and ensure the NBR's commitment to long-term sustainability of its interventions by forming unit committees² and drafting

¹ BTFA defines "monetization" as "the identification of costs associated with unnecessary steps, putting a dollar amount on those extra trips to a facility (time, taxi, fuel, etc.) or extra copies of documents, extra unofficial payments, perhaps for access, additional costs when rented trucks take a day instead of half a day. Whilst individually these can be small amounts, the cumulative cost these additional steps add to carrying out trade may be significant" (BTFA email, July 31, 2017). The team has elected to use this term for consistency's sake, as multiple referenced BTFA documents use it. However, in common economics usage, monetization generally refers to converting some commodity, good, or service to cash. BTFA may wish to consider using a different term going forward, such as "quantification of economic benefits."

² Unit committees address specific tasks (such as the Authorized Economic Operator Committee).

related statutory regulatory orders or regulatory orders for specific activities to safeguard their codification.

The Customs website was launched on September 20, 2017, and the National Enquiry Point was scheduled to be launched later in 2017. The evaluation team's review of the website content and accessibility found the trade-related information to be comprehensive (including providing access to legal and regulatory information and necessary forms), whereas its interfaces could be more user-friendly. The National Enquiry Point will provide the public with fast online NBR responses to Customs-related questions. As of June 8, 2017, the National Enquiry Point was 80 percent complete in its functionalities but was not error-free and needed further testing before being launched.

BTFA provided trainings on risk management and post-clearance audits to Customs officials. These were well received, except for a preference for trainings in Bangla and longer, more hands-on trainings. Transaction-based Post Clearance Audit is being used throughout Bangladesh. The Asian Development Bank has assumed responsibility for implementing systems-based post clearance audits. The Authorized Economic Operator program is scheduled to be launched in November, 2017. The Customs intelligence database and profiles and case management are in development stages. However, BTFA states that it has prepared architectures for these which have been approved by Customs Intelligence and Investigation Directorate. Systems-based risk management (including Customs Intelligence Database and Case Management) and Authorized Economic Operator are integral aspects in implementing systems-based post clearance audits. BTFA is in the information-gathering stage relating to reducing non-tariff barriers to trade in the agriculture sector.

Advance rulings have been successfully implemented, and the Authorized Economic Operator program was scheduled to be launched in November 2017. BTFA is in the information-gathering stage relating to reducing non-tariff barriers to trade in the agriculture sector.

BTFA has not implemented some of its planned activities in the timeframes originally established in annual work plans, and there have been delays in reaching some benchmarks. BTFA has made some progress on the cross-cutting gender issue, including conducting two trainings and holding a radio show with the Dhaka Women Chamber of Commerce and Industry, which stated that it was pleased with BTFA's efforts.

Conclusions: BTFA has had only limited successes over the past three years in facilitating trade in Bangladesh. However, it has built momentum in the past year (2016–2017) and is making progress in implementing some key trade facilitation measures.

Recommendations: BTFA should prioritize and focus on key measures that will reduce Customs clearance time and costs, thereby leading to the Activity's stated goal of trade facilitation leading to economic growth. The Activity should begin the process of handing over maintenance and updating of the website while continuing to provide technical assistance and capacity building to NBR. BTFA should also monitor NBR's personnel performance during this period. This will facilitate NBR's ability to build the necessary capacity and know-how to sustain the website after the Activity ends.

Key trade facilitation tasks include pre-arrival processing, risk management and post clearance audit. NBR has stated that it wants BTFA's continued technical assistance on auction procedures, expedited shipments, the Authorized Economic Operator Program, and Customs-business partnerships. If BTFA decides to pursue activities relating to agricultural non-tariff barriers, it should first obtain support and commitment of the ministries of jurisdiction, including the Ministry of Commerce and Ministry of Agriculture /Department of Agriculture Extension.

An NBR official told the team that implementing domestic transport work is not possible within BTFA's remaining time period and is not an NBR priority activity at this time. Consequently, BTFA should place assistance for domestic transport on hold and seek clarification of NBR's wishes. BTFA should also seek clarification from NBR on whether it wants assistance on brokers' licenses.

Question 2: How effectively has BTFA developed a sense of ownership by the Government of Bangladesh (GOB) of the reforms and improvements in trade-related processes?

Findings: NBR has adopted the enhanced Customs website and the National Enquiry Point, and shown its willingness to commit staff resources to update and maintain these functions, implement advance rulings and the upcoming Authorized Economic Operator program, and take steps to codify authority for these measures by including them in the 2016 and 2017 budget measures.

In addition, NBR has expressly stated that it wants BTFA's support in implementing pre-arrival processing, expedited shipment, and auction reform. NBR wants continued support from BTFA and the Asian Development Bank on the Authorized Economic Operator program and post-clearance auditing.

BTFA's current work plan includes implementing systems-based risk management. However, NBR told the team that it has yet to decide which donor (United States Agency for International Development (USAID)/ BTFA or the World Bank) will provide assistance in implementing this intervention.

Conclusions: BTFA has developed a sense of ownership by NBR and the Government of Bangladesh for some key activities.

Recommendations: BTFA should seek clarification from NBR as soon as possible regarding BTFA's or the World Bank's respective roles in implementing a computer-based risk management system.

Question 3: To what extent will the outcome of BTFA interventions likely result in increased trade volumes?"

Findings: BTFA is implementing key trade facilitation measures. Interviewees unanimously agreed that such measures would enable them to increase their trade flows. Secondary data support the theory that implementing key trade facilitation measures results in increased volume of trade and economic growth.³

Conclusions: BTFA reforms currently being undertaken would most likely lead to increased trade volumes, if fully implemented.

Recommendations: After assessing and consulting with NBR regarding priority tasks, BTFA should focus on implementing NBR-identified priorities during the remaining period of the Activity. That would allow BTFA to successfully accomplish some specific interventions.



BTFA team meeting with NBR

Question 4: What challenges has BTFA faced in implementing its activities, and how has BTFA responded to those challenges? Are there any recommended alternatives to these approaches?

³ 2015 Annual Report, World Trade Organization, p. 7.

Findings: BTFA faces three primary challenges. First, it takes time for NBR to respond to BTFA. NBR's Chairman told the team that NBR would like to have input in determining BTFA's timeline for meeting benchmarks and implementation activities, but did not suggest any particular vehicle for providing that input. A second challenge is the lack of donor coordination. NBR has stated that it recognizes the need for greater donor coordination, and that one reason for delays in implementing procedures is that different donors offer differing methods and ideas, and "nothing gets done." The third challenge is duplication of efforts within Customs (e.g., between the Modernization Unit and local Customs Houses).

Conclusions: There is a serious lack of donor coordination on the part of NBR. However, donors (including USAID), must work to ensure there is less duplication of donor programs. In addition, there is also insufficient coordination among NBR's Modernization Unit, BTFA, and the local Customs Houses.

Recommendations: To promote donor coordination, increased efficiency and performance, and greater aid effectiveness, BTFA/USAID should insist on regular meetings with other donors and NBR to discuss and coordinate donor activities.

BTFA also should work with NBR's Modernization Unit and the local Customs Houses to coordinate activities. The team recognizes that this may be challenging, particularly when the larger Customs Houses initiate activities and want ownership of those activities.

To address the NBR Chairman's concerns about providing input, BTFA should, to the extent possible, consult with NBR on issues such as formulating timelines for meeting benchmarks and goals. This could help to impart NBR with a sense of ownership, enhance its commitment to specific tasks and benchmarks, and improve or facilitate NBR's response time to BTFA. This could be done through regularly scheduled meetings between BTFA and the responsible NBR staff, with meeting minutes circulated to participants and, to the extent feasible, to more senior NBR officials.

Question 5: *What future trade-related interventions (either current BTFA activities requiring additional support or new activities that are not part of BTFA's scope of work) would be necessary or very helpful to achieve the overarching objective of greater economic growth through increased trade?*

Findings:⁴ First, implementing key Automated System for Customs Data (ASYCUDA) World modules and platforms (specifically, risk management, post-clearance audits, and pre-arrival processing) at all borders and ports would lead to faster, more transparent, and more uniform Customs clearances, reduced costs, and most likely increased trade flows and an improved investment climate for both foreign and local investment. In turn, this should create employment, stimulating economic growth and improving existing social conditions. System-generated assessments and determinations also would take the onus of seeking revenue maximization from Customs officials. BTFA should prioritize implementation of these key ASYCUDA World functions over its remaining time, focusing on pre-arrival processing, in particular, and risk management, depending on NBR's decision.

Second, NBR's focus on meeting revenue targets can hinder rather than facilitate trade. A follow-on activity could work with NBR to adopt a policy of realistic targets for revenue collection and promote a culture of facilitating trade rather than maximizing revenue. Research studies indicate that implementing key trade facilitation measures actually will increase national revenue collection.⁵ If a preliminary study

⁴ Due to the nature of this question (recommendations regarding future programming), the answer does not use the Answer, Conclusions, and Recommendations format used in the four preceding questions.

⁵ 2015 Annual Report, World Trade Organization, p. 10.

were done and it found this premise holds true for Bangladesh, it would reassure the Government of Bangladesh about revenue generation.

Third, NBR's current system of rotating Customs officials within the Customs, Revenue and value added Tax (VAT) agencies is incompatible with retaining a cadre of trained officials in Customs functions. NBR's Chairman told the team that NBR plans to establish career paths for officials in the various Customs areas, such as risk management and post-clearance audits. This could present an opportunity for BTFA to work with NBR to adopt a more measured approach to rotation.

Fourth, unsynchronized Customs working hours and a lack of interconnectivity result in time lost, damage to cargo, and pressure on already-inadequate storage space at borders for shipments. Given BTFA's limited time remaining and long list of activities, addressing these delays would best be part of a new follow-on activity. Such an activity should work with the private sector to facilitate and implement more synchronized hours of Customs operations; ensure software connectivity between Customs land borders, ports, and port authorities; and enhance cross-border cooperation with border and port authorities, the Navy, and other entities involved in Customs clearance.

Fifth, NBR's Training Academy plays an important role in preparing Customs officials with the necessary knowledge to execute their duties. NBR's Chairman told the team that he wants to showcase the Training Academy and, as noted above, is committed to developing a cadre of officials trained in specific Customs areas. This presents an opportunity to improve the Academy's training capabilities. BTFA can seize the opportunity to influence improvements at the Academy, including retaining a permanent faculty instead of using a temporary rotating faculty. To the extent feasible, BTFA could propose working with NBR's Chairman and the Academy to assist in fulfilling the Chairman's goals and vision for the Academy.

Sixth, the primary barriers to women in trade include a lack of access to finance, information, knowledge, and training. A future activity could set up small business centers nationwide, including in rural communities. Centers could operate on a scheduled, less-than-daily basis to provide certainty and predictability. They could provide information on how to start a business, training on import and export rules, and tips on how to survive and sustain a business in a competitive environment. This activity could be done in conjunction with the Bangladesh Women Chamber of Commerce and Industry.

LESSONS LEARNED

Most of the private sector was unaware of BTFA's activities, and BTFA's newsletter does not appear to reach a critical mass of traders. To remedy this, BTFA and NBR should engage in greater outreach to targeted groups at public events, as well as placing booklets and signs about the Customs website and the National Enquiry Point at Customs Houses and using other media outreach.

Customs officials expressed a strong preference for trainings in Bangla. While BTFA's trainings have been well received, it is likely that the trainings would prove to be more beneficial if conducted in Bangla. BTFA should consider conducting trainings in Bangla, to the extent possible. If trainings are conducted in English, the training should provide simultaneous translation into Bangla.

EVALUATION PURPOSE & EVALUATION QUESTIONS

EVALUATION PURPOSE

The United States Agency for International Development (USAID)/Bangladesh contracted International Business & Technical Consultants, Inc. (IBTCI), through the Accelerating Capacity for Monitoring and Evaluation (ACME) activity contract (AID-388-C-14-00001). The Bangladesh Trade Facilitation Activity (BTFA) is an activity under “Development Objective (DO) 2: Food Security Improved,” of USAID/Bangladesh’s Country Development Cooperation Strategy (CDCS).

The purpose of this mid-term evaluation is to assess the extent to which BTFA is on track to meet its overall performance goals and to inform USAID management of any challenges or opportunities that warrant adjustments to ensure the achievement of those results. In particular, the evaluation team (team) sought to identify what course corrections, if any, are needed in the time remaining for implementation of the project, and to recommend to USAID key strategic and programmatic options for future trade-related engagements in Bangladesh.

EVALUATION QUESTIONS

The evaluation asked five questions:

1. To what extent is BTFA on track, in terms of progress and outcomes, to meet its overall objective? The response should (at a minimum) address the following:
 - Improved availability, transparency, and utilization of trade-related information by the private sector;
 - Tangible improvements in efficiency (i.e., reduced time and cost) of trade-related processes; and
 - Design and implementation of technology components of the project, including new Customs website, risk analysis and case management system, and auction system.
2. How effectively has BTFA developed a sense of ownership by the Government of Bangladesh (GOB) of the reforms and improvements in trade-related processes?
3. To what extent will the outcome of BTFA interventions likely result in increased trade volumes?
4. What challenges has BTFA faced in implementing its activities and how has BTFA responded to those challenges? Are there any recommended alternatives to these approaches?
5. What future trade-related interventions (either current BTFA activities requiring additional support or new activities that are not part of BTFA’s scope of work) would be necessary or very helpful to achieve the overarching objective of greater economic growth through increased trade?

Additional Evaluation Guidance from USAID: On May 8, 2017, the team held a meeting with USAID to clarify the evaluation scope of work, timeline, deliverables, and report expectations. With respect to Evaluation Question 3, BTFA’s Contracting Officer’s Representative (COR) noted that the team might not be able to provide direct quantitative

findings relating to an increase in the volume of trade as a result of BTFA's assistance to the GOB on facilitating international trade. The COR noted, however, that the team could assess the development hypothesis and obtain quantitative information from traders and companies of all sizes as well as research information on the impact of trade facilitation in other countries.

Regarding Evaluation Question 5 on future interventions, BTFA's COR requested that the team focus on: 1) areas where work has begun but will not have matured when the BTFA comes to a close and, therefore, could use further support; and 2) areas not currently included in the BTFA scope of work that are important for helping the GOB facilitate international trade.

With respect to gender awareness under cross-cutting activities, USAID proposed that the team either focus on reasons why there are not more women in business and international trade, or try to identify the barriers to women in trade.

With respect to the enhanced Customs website (website), BTFA's COR asked the team to address four questions: Is the technology robust? Is there an appropriate plan in place to sustain the technology? Is there a plan to update the content? Is there a commitment in place for continuation?

PROJECT BACKGROUND

BTFA is a five-year activity, which began in September 2013 and is scheduled to end in September 2018. BTFA is being implemented by IBI International and Nathan Associates in collaboration with the Bangladesh National Board of Revenue (NBR). During the first three years, implementation also involved the Bangladesh Ministry of Commerce (MOC).

BTFA's objective is to bolster economic growth and food security by creating greater efficiency in cross-border trade and enhancing market access by reducing custom clearance time and costs.

Initially, BTFA's task order (TO) included three intermediate results (IRs): IR 1: Information and Transparency Enhanced; IR 2: National Single Window (NSW) Operational; and IR 3: Supply Chain Security Enhanced. However, as a result of negotiations between USAID and the World Bank (WB) in Year 2, the WB assumed responsibility for the development of the NSW, IR 2 was renamed Supply Chain Security Enhanced, and IR 3 was eliminated via a March 2016 TO amendment. In August 2016, BTFA's TO was further amended to reflect a task realignment, including additional tasks under IR 1 and IR 2.

IR 1: Trade-Related Information and Transparency Enhanced: This task assists NBR to be in compliance with its obligations under the World Customs Organization (WCO), Revised Kyoto Convention (RKC), and the World Trade Organization (WTO). These obligations require transparency, predictability, and uniformity of international trade laws, regulations, and procedures, which aim to facilitate trade, thereby creating conditions that lead to increased trade flows and economic growth.

IR 2: Supply Chain Security Enhanced: The IR 2 tasks build, in part, on IR 1, and are focused on the supply chain to achieve faster and more secure clearance of goods, thereby balancing trade facilitation and enforcement of Customs laws while protecting revenues.

Cross-Cutting Activities: BTFA’s scope of work (see Table I below) also comprises cross-cutting activities, including promoting private sector and gender awareness of trade facilitation advances, and estimating “monetization” (i.e., projecting the estimated economic impact)⁶ of BTFA trade facilitation measures.

Table I. BTFA Scope of Work

IR1: Trade-Related Information and Transparency Enhanced	IR2: Supply Chain Security Enhanced	Cross-Cutting and Additional Activities
<p><u>Activities:</u></p> <ol style="list-style-type: none"> 1. NBR/Customs website enhanced 2. National Enquiry Point established 3. Advance ruling provisions implemented 4. Customs auction procedure enhanced* 5. Non-tariff barriers to agricultural imports and exports reviewed* 6. Selected standard operating procedures, instructions, statutory regulatory orders, guidelines, and manuals reviewed and updated* 7. Broker licensing procedures reviewed and updated* 	<p><u>Activities:</u></p> <ol style="list-style-type: none"> 1. Economic operator program authorized 2. Pre-arrival processing of import declarations* 3. Movement of goods intended for import under customs control (domestic transit)* 4. Risk management system implemented 5. Expedited shipment (courier services) enhanced* 6. NBR/Customs trade intelligence capacity enhanced* 7. Post-clearance audit system implemented 8. Customs-business partnerships strengthened 	<p><u>Activities:</u></p> <ol style="list-style-type: none"> 1. Newsletters showcasing BTFA activities posted 2. Possibility explored of exploiting mass media (e.g., Facebook, YouTube) to promote NBR achievements and trade information 3. Monetization of project initiatives projected to demonstrate savings to trade 4. Gender-based trade awareness trainings and radio programs conducted on trade-related issues

* Indicates tasks resulting from the August 2016 amendment and realignment.

EVALUATION METHODS & LIMITATIONS

METHODS

The team used several data collection methods to evaluate BTFA performance. First, the team conducted an in-depth review of numerous documents, including quarterly and annual reports; monitoring data; baseline reports; gap analyses; training and capacity-building reports; and other BTFA deliverables and documents. The team also interviewed 126 key informants (KIs) and held six focus group discussions (FGDs) in Dhaka, Jessore, Benapole, Bhomra, Mongla, Khulna, and Chittagong. (See detailed methodology in Annex 1.) The team prepared an evaluation design matrix linking the evaluation questions and respondents. Finally, BTFA staff completed a self-assessment questionnaire (see Annex 2, Part 6), with a 100% response rate.

LIMITATIONS

The document review relied on the availability of documents, including program and beneficiary records and data collection forms. The outcome of the key informant interviews (KIs) was determined by the availability of appropriate interviewees. The evaluators were successful in obtaining necessary documents, and, for the most part, meeting the right interviewees, and using

⁶ see footnote #1

these data sources to answer the evaluation. The evaluators would prefer to have met sooner and had more time, including one-on-one interviews, with NBR officials. However, the evaluators are confident that sufficient information was obtained during the NBR interviews to make the findings reflected in this report.

FINDINGS, CONCLUSIONS, & RECOMMENDATIONS

EVALUATION QUESTION 1: *To what extent is BTFA on track, in terms of progress and outcomes, to meet its overall objective?*

Evaluation Question 1 overlaps with BTFA's tasks under both IR 1 and IR 2. IR 1 focuses on improving availability, transparency, and utilization of trade-related information by the private sector. Seven activities were geared toward achieving this goal, including BTFA's work on the enhanced Customs website (website) and the National Enquiry Point (NEP); work toward implementation of advance rulings (ARs); activities related to auction procedures and non-tariff barriers (NTBs); modernization of standard operating procedures (SOPs), standard regulatory orders (SROs), instructions, guidelines, and manuals; and updating of brokers' licensing procedures. The team addresses IR 1 in seven sections corresponding to the activities listed above and in Table I.

I. WEBSITE AND NEP: TRADE-RELATED ASPECTS

Findings: BTFA has been assisting the NBR in building and implementing the website and the NEP, a website portal. The website will provide a platform for transparent access to reliable and predictable Customs information (laws, rules, duties, etc.) for trading across borders, consistent with Article I of the WTO Agreement on Trade Facilitation. (TFA)⁷ The website also will provide a forum for private sector comments on proposed laws and policies.⁸

Based on a review of the available functions, the team found that the website contains comprehensive Customs information, and together with the NEP, provides access to transparent and predictable trade-related information in compliance with Bangladesh's obligations under the TFA.

The website has five main functions for trade information, including: 1) Legislation: laws, SROs, statutory orders (SOs), and SOPs; 2) Trade information: tariffs, the Authorized Economic Operator (AEO) program, AR database, dispute settlement, transit, trade incentives, trade remedies, fees and charges, agent information; 3) Customs procedures; 4) Forms and documents; and 5) eService.

The NEP function will contain a Frequently Asked Questions (FAQs) section, which had, at the time of the evaluation, 110 FAQs.⁹ More FAQs will be added as needed.

The website was launched on September 20, 2017 (after the completion of the team's work), and the NEP was scheduled to launch later in 2017. NBR has increased the number of information technology (IT) officials on its staff to maintain and regularly update the website.

⁷ WTO Agreement on Trade Facilitation signed in Bali in November 2014.

⁸ Currently, comments are provided in meetings between NBR and stakeholders' prior to passing of the Budget Measure.

⁹ The current FAQ questions were identified by USAID and BTFA through consultations with public and private sector stakeholders. National Enquiry Point: Comprehensive Database of Frequently Asked Questions (FAQs), USAID/Bangladesh Trade Facilitation Activity.

BTFA has stated that there is a draft SRO to mandate and provide an NBR management structure to update and sustain the website.

The team found that Customs brokers, importers, exporters, and the trading community, in general, were not aware of the website or the NEP. BTFA explained that it was awaiting the official launching of the website before engaging in outreach to the trading community. However, some members of the Chittagong Clearing and Forwarding Association noted they were aware of the website and had used it to obtain trade-related information. Most of the local Chambers of Commerce and Industry (CCIs) also were aware of the website and the NEP. The Bangladesh Federation of CCIs has offered, in conjunction with BTFA and NBR, to organize a series of workshops and public awareness events showcasing the website and the NEP to the trading community.

Conclusions: The website provides easy access to comprehensive and transparent information. It was too early to assess how the NEP will function because it was not yet operational. Both the website and the NEP have the potential to be useful tools for the trading community. However, to be fully effective, the trading community must be aware of these services.

Recommendations: During its remaining time, BTFA should begin handing over maintenance and updating of the website to NBR, while continuing to provide technical assistance, capacity building, and regular monitoring to ensure that NBR personnel are updating and managing the website and the NEP. This will more fully equip NBR to assume responsibility for managing and sustaining the website once the Activity ends.

BTFA and NBR are proposing to place advertisements in newsletters and newspapers regarding the website and NEP. This may not be sufficient. BTFA's newsletters are few, and newspaper ads may not reach the targeted trading community. BTFA and NBR should consider outreach events targeting the trading community. Another effective way to reach traders would be to have booklets, information, and signs available at Customs Houses throughout the country. The website also should be linked to the trade portal at the Bangladesh MOC in order to link users with other related trade information.

The name National Enquiry Point should be changed to Customs Enquiry Point or National Customs Enquiry Point or some other name, because under WTO practice, the National Enquiry Point, is usually a country's source of information for WTO-related agreements.

2. WEBSITE AND NEP: IT ASPECTS

Findings: Website development took place from 2015–2016. Most of the website's sections work well, with the exception of some small glitches and postscript vulnerability. Some documents in English lack a corresponding version in Bangla.¹⁰ There are also insufficient advanced updating features in the website's back end. The NEP website portal is a helpdesk-type application.

Conclusions: The content-rich website will help traders globally. The NEP website portal was 80 percent complete in its functionalities as of June 2017, and still needed to be enhanced with additional functionalities. The NEP portal was not yet error-free at that time and needed further testing before launching.

¹⁰ Missing Bangla content versions include: Events, some SOs and SROs.

Recommendations: There is a need for user-friendly forms to facilitate data updates in the back end. The website also should have its own automatic back-up system. The website development platform (PHP version) should be updated on a regular basis to enhance security and should incorporate completely automated public Turing test to tell computers and humans apart (CAPTCHA) tests (steps to ensure that the user is not a robot) and email confirmation for all public forms. (See Annex 4 for details about the website and NEP.)

3. ADVANCE RULINGS (ARS)

Findings: ARs are trade facilitation measures in compliance with Article 3 of the TFA. They are binding decisions issued by NBR at the request of a trader, company, or person concerning particulars for a specific item or commodity intended for importation or exportation. An AR brings certainty to an importer and immediate clarity to Customs officials while speeding up Customs clearance.

BTFA has been assisting NBR in implementing ARs since Year 1. NBR, with BTFA's assistance, established an AR Unit in June, 2016 pursuant to an NBR AR Order that delineated the composition of the Unit. BTFA also assisted in preparing the final draft of the Order.

The Budget Measure of 2016–2017 issued an SRO under Sections 219 and 219A of the Customs Act of 1969 for ARs in tariff classification. The 2017–2018 Measure amended the 2016 ARs SRO to include country of origin rulings.

NBR has begun issuing ARs in classification and is expanding the scope to include country of origin. Currently, ARs can be requested online on the website, with an NBR response time of 45 days. As of mid-May, 2017, NBR reportedly had received eight applications and had issued six AR decisions. Members of the trading community who are aware of this service view it very positively and believe that it will facilitate trade and lead to greater trade flows. However, the team found that this information is not widely disseminated or known to the trading community.

Section 275 of the new Customs Act provides for ARs in classification and country of origin. This provision, on its face, is legally limiting and should be expanded to broadly cover ARs or “rulings,” and/or, at a minimum, include rulings for classification, country of origin, and valuation to meet future needs.

Conclusions: ARs are a valuable Customs service that will facilitate trade. BTFA's assistance to NBR regarding the issuance of ARs has had some success insofar that six rulings had been issued by mid-May, 2017. However, there has not been sufficient outreach to the trading community; the team found that many traders were unaware of this important Customs service.

Recommendations: BTFA and NBR should expand their outreach efforts to the trading community (as described in the Lessons Learned part of this report) to inform traders of this important Customs service. In addition, the new Customs Act should be modified to broaden its scope to cover rulings in general for future needs or, at a minimum, add rulings in valuation.¹¹

4. ENHANCED CUSTOMS AUCTION PROCEDURES

Findings: This BTFA task was added after realignment of the TO in August 2016. Customs

¹¹ The evaluation team makes no comments on other aspects of the new Customs Act, as the legal sufficiency of the Act is outside the scope of this evaluation.

auctions are a procedure whereby Customs can recover revenue and costs against goods that have been abandoned or have not been cleared within the prescribed timeframe. Goods and cargo are currently auctioned under the provisions of Section 82 of the Customs Act of 1969. However, goods stored for auction create inefficiencies, as they use valuable storage facilities, can decrease in value while awaiting auction, are subject to pilferage, and have a negative impact on revenue collection.

Under NBR's current practice, auctions generally have a reserve price for each item, with three rounds of bidding if the reserve price is not met. The first round must meet 60 percent of the reserve price, the second round must meet 50 percent of the reserve price, and the item sells at the highest price of the third round.

Auction procedures are not uniform throughout the country. Even in a given location, the process can be unpredictable. Private-sector key informants expressed to the team a lack of confidence in and high level of frustration with the auction procedures.



Benapole Customs Warehouse

One interlocutor advised members of team not to “spend any time on auctions because it will never be solved.” Many private-sector interlocutors also said they believe the auction process is “unfair.” This frustration stems, in part, from the public's belief that auctions are not transparent. There is a perception that many underlying forces that “cannot be fixed” influence auction proceedings, particularly given the three-tier bidding system. Key informants described these challenges as too difficult to overcome.

The private-sector interlocutors seemed more inclined to have confidence in online bidding approaches. To assist NBR in harmonizing auction procedures nationwide, BTFA has been supporting implementation of online auction procedures. Under BTFA's plan, online bidding would be nationwide, meaning, for example, that someone in Dhaka could bid on an item in Chittagong. NBR has expressed support for BTFA's assistance on this task. The United Nations Conference on Trade and Development (UNCTAD) is assisting NBR with automation of the online auction procedure.

BTFA conducted an auction workshop on July 24, 2016, attended by 18 Customs officials and ASYCUDA (Automated Systems for Customs Data) experts from NBR/Customs field offices around the country.¹² On August 4, 2016, BTFA provided a report to the NBR Second Secretary with recommendations from the workshop, including an enhanced SOP for UNCTAD to use as a basis for automation of bidding. On December 7, 2016, BTFA provided a further enhanced version of the SOP to NBR. As of July 30, 2017, NBR had not taken any action on the SOPs.¹³

A Customs senior programmer from the Customs House Chittagong (CHC) informed the team that CHC also has been working on online bidding and has prepared relevant laws and SROs. They expect to launch online bidding in an ASYCUDA World function in late 2018 (pending

¹² BTFA August 2016 Annual Report, p. 17.

¹³ The Second Secretary reportedly was rotated out of the position. Source: BTFA (July 31, 2017).

NBR approval of the SOP). The intention is to make online bidding publicly available; however, due to transport problems and security issues, online bidding initially will be available only locally. This is an example of duplication of efforts at NBR. BTFA staff told the team that NBR specifically requested that BTFA work on auction procedures and has advised the CHC to work with BTFA on this matter.¹⁴

Conclusions: Given the private sector’s dissatisfaction with current auction procedures, auction reform efforts clearly continue to be needed. The evaluation results suggest that even if BTFA were successful in standardizing auction procedures throughout Bangladesh, the public would most likely still distrust auction procedures, and the process would not yield the anticipated benefits of transparency and predictability. Implementation of online bidding represents the path forward for transparent, harmonized auction procedures.

Recommendations: BTFA and NBR should focus on implementing online bidding and coordinate their activities with the CHC’s efforts to establish an online auction plan and procedures.

5. NON-TARIFF BARRIERS (NTBS) TO AGRICULTURAL IMPORTS

Findings: This BTFA task was added after realignment of the TO in August 2016. BTFA is in the information-gathering stage to develop a roadmap for addressing NTBs to facilitate agricultural trade. By the end of the second quarter of 2017, BTFA had completed questionnaires and had begun disseminating them to relevant stakeholders. BTFA also has finalized a methodology for interviewing stakeholders and collecting interview data.¹⁵

NTBs include transport costs, poor infrastructure, and Customs delays. The agricultural sector faces additional NTBs with respect to meeting conformity assessment standards under the Agreement on Technical Barriers to Trade (TBT) and the Sanitary and Phytosanitary Agreement (SPS) in the absence of Mutual Recognition Agreements (MRAs).¹⁶ This is a complex process that will need to involve the MOC, the Ministry of Agriculture (MOA, including the Department of Agriculture Extension, DAE), the Bangladesh Standards and Testing Institution (BSTI), and other government entities that also are working on these issues.

A shortage of laboratory testing facilities at border posts results in delays.¹⁷ Sometimes there are delays in obtaining import permits, which are issued in Dhaka, but the team did not find that issuance of permits was a significant barrier overall. In general, permits are issued within a reasonable timeframe and are sent by email.

Bangladesh accepts health and other relevant certificates from exporting countries, but, in accordance with import policy testing requirements, certain agricultural products (55 items on the NBR’s Import Policy list) are tested even when accompanied by the proper certificate or documentation. In such cases, Customs usually releases the shipment while the testing is being conducted. According to Customs, the released items generally meet the required standards,

¹⁴ Communication with senior BTFA staff.

¹⁵ BTFA Report, Y17, Q2, p. 8.

¹⁶ A Mutual Recognition Agreement (MRA) means that two or more countries agree to recognize one another’s conformity assessments as equivalent in order to meet compliance with the country’s regulatory requirements. It is a voluntary agreement between governmental conformity assessment bodies.

¹⁷ According to the Bangladesh Standards and Testing Institute (BSTI), BSTI has a program in place to complete lab facilities in Chittagong and Khulna by 2019. BSTI has proposed another five-year program for fully functional lab facilities throughout Bangladesh.

and the testing is simply a precaution in the event that the merchandise has deteriorated during shipment.

Bangladesh faces challenges with respect to other countries accepting its health certificates. For example, a large exporter/importer of food items to India told the team that India does not accept the validity of testing certificates from Bangladesh. Officials at the DAE also voiced concern that India refuses to accept its testing and is reluctant to buy Bangladesh's raw agricultural products.

In June 2015, BSTI and the Bureau of Indian Standards (BIS) signed a bilateral cooperation agreement (BCA) for an action plan concerning the use of marks of conformity for products and services. In April 2017, in accordance with this BCA, Bangladesh and India agreed to a list of 21 products that can now be imported with mutual recognition and acceptance of tests. Negotiations are underway to add six additional items to this list.¹⁸ When informed of this agreement by the team, the same large exporter/importer welcomed it and stated that, if implemented, this would reduce NTBs to their exports to India.

Conclusions: BTFA's activities in this area are in the beginning stages. The team does not have sufficient information to assess BTFA's impact on this task or to pinpoint how BTFA will focus its efforts¹⁹.

Recommendations: BTFA should consult and work with the relevant ministries to obtain their support and commitment before undertaking NTB agricultural interventions that are within the ministries' jurisdiction. Given that BTFA has limited time remaining, the team recommends that BTFA narrow its focus to achievable tasks. Such tasks could include assisting the MOC with its ongoing efforts to gain market access in India for Bangladesh's agricultural products.

6. STANDARD OPERATING PROCEDURES (SOPS), STATUTORY REGULATORY ORDERS (SROS), INSTRUCTIONS, GUIDELINES, AND MANUALS

Findings: This BTFA task was added after realignment of the TO in August 2016. BTFA assisted NBR in drafting the new Customs Act as well as related SOPs, SROs, and manuals. Although passage of the new Customs Act is expected, the timeline is uncertain. The team confirmed that BTFA also prepared a training-of-trainers manual on PCA (May 2015) and developed guidelines for the courier program.

During a meeting with multiple NBR staff on June 7, 2017, an NBR official told the team that NBR did not need BTFA's support on this task, stating that it is capable of accomplishing these tasks on its own and has been doing so for years. However, NBR meeting participants reiterated that BTFA's assistance to NBR on preparing these regulatory drafts had been helpful.

¹⁸ The bilateral cooperation agreement identified 21 items subject to the action plan for the year 2016. A notification dated April 3, 2017, issued by the Food Safety and Standards Authority of India, stated that the Bangladesh Standards and Testing Institute (BSTI) was authorized to issue "Certificates of test analysis for food products" identified in the list and that the "certificate issued by BSTI shall be accepted by the authorities in India dealing with food imports." The evaluation team provided a copy of the notification to BTFA at a debriefing on June 8, 2017.

¹⁹ BTFA subsequently stated that its NTB activities include two studies. (1) A review of NTBs in Bangladesh faced by Bangladeshi exporters and importers in international trade; 2) A similar review in India to identify the NTBs Indian exporters and importers face in trading with Bangladesh. Even in this case, the team recommends that BTFA should consult with the ministries of jurisdiction.

Conclusions: There appears to be a lack of clarity (or indecision) on the part of NBR regarding BTFA's assistance in this area.

Recommendations: BTFA should seek clarification from NBR on its priorities for BTFA's assistance.

7. BROKERS' LICENSING PROCEDURES

Findings: This BTFA task was added after realignment of the TO in August 2016.

BTFA is in the process of reviewing the existing broker and self-clearance licensing processes with an eye toward possible reforms. Although BTFA intends to submit a draft report to NBR in FY 2017, in the above-mentioned meeting on June 7, an NBR official told the team that NBR did not need BTFA's support on this task.

Current licensing challenges include the fact that Customs brokers' licenses are expensive, and brokers can clear imports only at the location where they are licensed. Brokers complain that the licensing exam is difficult. At the same time, brokers admit that they are a powerful group and influence the issuance of licenses.

Officials at the Dhaka Customs House (DCH) confirmed that they had issued 1700 brokers' licenses that are now in the system. DCH cannot issue any more licenses because they are unable to handle any more brokers. As a result, NBR has placed a moratorium on the issuance of brokers' licenses. Of these 1700 licenses, however, only about 150 brokers are active. This means that the majority of licenses are inactive, yet the doors are closed to new brokers at this time.

Conclusions: There is a need for reforms in the issuance of Customs brokers' and self-clearing licenses, particularly with respect to the current NBR moratorium. BTFA's activities in this area are in the beginning stages, and the team does not have sufficient information to assess BTFA's impact on this task.

Recommendations: In light of statements made in the June 7 meeting, BTFA should seek further clarification from NBR concerning this task. Supporting NBR's priorities for BTFA assistance will facilitate a greater chance of success for BTFA to accomplish its tasks.

EVALUATION QUESTION 1: IR 2

BTFA's tasks under IR 2 focus on enhancing supply chain security. The team addresses IR 2 in eight sections corresponding to the eight activities listed in Table 1: 1) Authorized Economic Operators Program; 2) Pre-Arrival Processing; 3) Domestic Transit; 4) Risk Management System; 5) Courier Services; 6) Customs Trade Intelligence Capacity; 7) Post-Clearance Audit System; and 8) Customs-Business Partnerships.

IMPLEMENTATION OF THE AUTHORIZED ECONOMIC OPERATORS (AEO) PROGRAM

Findings: The AEO program is a partnership between the trade community and Customs, where private-sector parties in the supply chain can apply for AEO status to receive trade facilitation benefits and, at the same time, verify and increase their level of compliance and security. AEO status grants special customs privileges and benefits that result in faster customs clearances.

BTFA has assisted NBR in establishing an AEO Technical Working Group and Subgroup. In addition, BTFA has assisted with the design of the AEO program, including identifying criteria for selecting firms for a pilot program and providing information in several technical reports. BTFA and the Asian Development Bank (ADB) have agreed to an action plan for the designated task areas; NBR approved the plan, which is valid until the end of 2017. (The parties will meet again to agree on a new action plan for 2018.) Under the action plan currently in effect, BTFA's responsibilities include legislative action, program design, and selection of AEO benefits and qualifications criteria. ADB responsibilities include addressing organizational structure, training and capacity building, and implementing system-based PCA.

On May 23, 2017, NBR announced that it would launch the AEO program in November 2017. NBR selected the pharmaceutical industry as one of three sectors to participate in the small AEO pilot program. According to a Customs official, NBR selected the pharmaceutical sector as a first pilot because its companies maintain good accounting records, have generally been in compliance with Customs rules and regulations, and have an acceptable compliance system in place. The same official stated that the remaining two sectors have yet to be selected for the pilot program.



Bhroma Land Port

The team ascertained that the AEO criteria devised by BTFA and NBR meet the international standard of the WCO Framework of Standards to Secure and Facilitate Trade (SAFE), although not all SAFE criteria are included in the AEO.

Conclusions: Piloting the AEO program in the pharmaceutical sector is a good start toward implementing a broader AEO program. When implemented, the AEO program should reduce clearance time and costs as well as build Customs-business partnerships.

Recommendations: BTFA should continue its efforts in this area, coordinating with the ADB and NBR according to the action plan.

2. PRE-ARRIVAL PROCESSING (PAP)

Findings: This BTFA task was added after realignment of the TO in August 2016. PAP refers to submitting goods and cargo declaration data to the relevant authorities prior to the arrival (for import) or departure (for export) of goods. This allows the authorities to conduct a risk assessment and to process the declaration for a release decision prior to the goods arriving at the port of entry or port of exit, thereby enabling release of the goods immediately upon arrival.

BTFA's tasks in this area include assisting NBR in evaluating and implementing a PAP program. NBR has stated, at a minimum, that it wants Customs to receive the manifest data after a vessel's departure from the last port. This is a key trade facilitation measure. NBR expressed a desire for BTFA's assistance on this task, which NBR believes can be implemented before BTFA comes to a close.

Pursuant to a letter by NBR issued in February 2017, a small PAP group (committee) was formed later that month. On March 13, 2017, BTFA facilitated a meeting of this committee and explained the requirements for implementing PAP, including drafting an SO to enable the process. BTFA reported that the committee agreed on the PAP principles and locations for implementation. The committee plans to review and agree on the SO.²⁰

Conclusions: Implementation of PAP, with concurrent connectivity of all parties to customs clearance procedures, will contribute to faster customs clearances. This is a key trade facilitation procedure.

Recommendations: BTFA should focus on assisting NBR in implementing this key trade facilitation procedure, especially given that NBR has expressly stated that it wants BTFA's assistance on this matter.

3. DOMESTIC TRANSIT (DT)

Findings: This BTFA task was added after realignment of the TO in August 2016. Under Article 9 of the WTO Trade Facilitation Agreement (TFA), members are obligated, to the extent that it is practical and all regulatory requirements are met, to allow goods intended for import to be moved from the port of entry to Customs facilities for release or clearance. The movement of goods stipulated in the TFA can be categorized as Domestic Trade (DT).²¹ The goods are moved under bond.

BTFA's reported activities in this area include drafting a new SO (or SRO) template as required for DT and working with the NBR/Customs and other stakeholders to determine the most appropriate guarantee mechanism in the context of Bangladesh. Future activities include implementing domestic transit clearance procedures using the online ASYCUDA World Customs clearance software, with assistance from UNCTAD.

The team did not find much interest in DT issues from private sector interviewees. In a meeting on June 6, 2017, WB officials stated that DT currently exists informally, and that there had been one known consignment, but were unable to state what entity had guaranteed the bond for that consignment. The main interest in DT appears to relate to implementation of the Bangladesh-Bhutan-India-Nepal Motor Vehicle Agreement (BBIN-MVA).

²⁰ See BTFA Second Quarterly Report, January-March 2017, p. 11, as well as BTFA's FY 17 W/P (October 2016–September 2017), Section 2.1.2, which details six specific BTFA activities under this task. BTFA will: (1) work with the new NBR/Customs 'committee' on PAP, to validate and implement a Standing Order template, suitable for national use in relation to Pre-Arrival Processes; (2) work with the NBR/Customs to implement PAP for 'IM7' warehousing declarations, as a first step to a wider PAP implementation; (3) continue to work with the NBR/Customs to identify low-risk commodities and importers to consult with for pilot implementation; (4) assist the NBR/Customs in reviewing the overall mix of random and criteria selectivity and also assist with the writing of risk profiles which will allow compliant traders using PAP an opportunity for release without Customs intervention; (5) support the NBR/Customs implementation team in launching a pilot PAP program; and (6) carry out a 'monetization exercise' to identify the effect of PAP declarations on potential savings that could be made in trade. This will be achieved through analysis of a combination of business process mapping and stakeholder interview responses (p. 13).

²¹ Designated as national transit under the Revised Kyoto Convention (RKC). Annex E of the RKC is about Customs transit, which may cover the national transit procedures.

In the June 7 meeting, an NBR official informed the team that NBR did not need BTFA's support on this task. The official noted that it would not be possible for BTFA to complete this task within its remaining time as this is a very complicated undertaking that can take years, including setting up the bond guarantees.

Conclusions: There does not appear to be much interest in the trading community in DT. According to NBR, this is not a priority procedure at this time.

Recommendations: BTFA should consider placing this activity on hold and concentrating on other tasks that can be completed or implemented that will have an impact on trade facilitation during the remaining time of the Activity.

4. RISK MANAGEMENT (RM) SYSTEM

Findings: Under Article 7 of the TFA, countries should adopt or maintain an RM system for Customs control. Standard 6.3 of the RKC and the corresponding guidelines define RM as the systematic application of management procedures and practices to provide Customs with the necessary information to address movements or consignments that present a risk.²²

BTFA has been assisting NBR/Customs in RM since the start of the Activity. BTFA has sent a draft SO to NBR regarding RM, which has circulated among commissioners for comments and suggestions. To date, no decision has been made. BTFA also has provided RM training to Customs officials. BTFA conducted an RM workshop on February 7, 2017, attended by a variety of stakeholders, including NBR officials. BTFA also plans to assist NBR in implementing system-based RM in Bangladesh before the end of the Activity.

Although there is currently no RM committee at NBR, there are local RM committees that operate independently of NBR Headquarters. CHC appears to have the most active local RM committee.

The team learned that the WB provided RM training to NBR in 2014 and facilitated the formation of an RM committee that is no longer in place. Although the WB is not currently providing any RM training, it plans to implement an automated RM system as part of the NSW and will resume training when the NSW launches within the next 18–24 months.²³

The team specifically questioned NBR as to which donor would be implementing an automated RM system and a senior NBR official stated that NBR has yet to make that decision.



Benapole Customs Warehouse Trucks

²² Trade Facilitation Implementation Guide, Customs Risk Management and Selectivity, <http://tfig.unece.org/contents/customs-risk-management.htm>.

²³ Meeting with the World Bank on June 5, 2017.

Borders and ports in Bangladesh use mostly transaction-based RM, except for the CHC, which partly uses system-based RM. Because the Chittagong port accounts for more than 80 percent of the country's imports and exports, it is not surprising that it has the most advanced automated RM system and other advanced Customs services. Some exporters in Mongla reported to the team that they prefer to use the Chittagong port because it is more efficient even though more expensive due to transport costs.



Benapole Customs Warehouse Delivery

Conclusions: The use of transaction-based RM slows clearances and hinders trade facilitation, resulting in greater costs and other collateral losses to traders. An automated RM system would speed up clearance, resulting in time and cost savings. Although the team was unable to determine whether BTFA's training of Customs officials had an impact on trade facilitation or faster clearances, the interviews with Customs officials suggest that the training was helpful.

Recommendations: It is both urgent and critical that USAID/BTFA seek clarification from NBR about its plans for working on system-based RM in order to avoid potential duplication between USAID and WB activities.

5. COURIER SERVICES

Findings: This BTFA task was added after realignment of the TO in August 2016. Under Article 8 of the TFA, "Each Member shall adopt or maintain procedures allowing for expedited release of at least those goods entered through air cargo facilities to persons that apply for such treatment, while maintaining Customs control." BTFA reported that it had reviewed the existing process and practices of both Customs and large courier companies to identify critical supply chain problems on the part of both Customs and stakeholders. BTFA also facilitated the establishment of a Stakeholder Working Group.

Courier industry key informants told the team that they are unhappy about the new SRO (August 13, 2016) and the requirement that they must obtain two licenses, one from Customs and the other from the Ministry of Communication. They also claimed that the new SRO imposes harsher penalties. They reported that it has become more difficult rather than easier for their sector to conduct business.



Dhaka Airport Express Courier Customs Clearance

Couriers also complained that the *de minimis*²⁴ rules are not being applied. Customs acknowledges that this is the case. In fact, one NBR official stated that Customs has not implemented the *de minimis* rule for the past 17 years. BTFA stated that it has proposed raising the *de minimis* amount to a significantly higher amount, but the couriers would be happy to have an even lower amount, as long as the rule is actually implemented. There is deep distrust between the courier sector and Customs.

In a meeting with the team on June 7, 2017, NBR officials said that this was a task where it wanted BTFA's technical assistance.

Conclusions: Overcoming the deep distrust between the courier sector and NBR is a challenging task. However, BTFA has facilitated the start of a dialogue between the two, which is an important step toward building a partnership between them.

Recommendations: Expedited services can serve an important function to Bangladesh's economic growth. Customs and couriers should find a way to communicate and build a partnership where there is greater trust, enforcement, and compliance. BTFA can assist in building a partnership between Customs and the express carrier sector by facilitating ongoing dialogue between these two parties. BTFA also should continue its efforts in working with NBR to implement the *de minimis* rule.

6. CUSTOMS TRADE INTELLIGENCE CAPACITY

Findings: BTFA is assisting NBR in developing the system architecture for a new web-based Customs Intelligence Database (CID), which will be available on the website. BTFA is also assisting NBR in developing a Case Management System (CMS), which will be accessible through CID. Both CID and CMS are in the development stages. BTFA has developed the profile forms; drafted a one-day *Intelligence Awareness Training Module* as well as a three-day *Basic Intelligence Training Module*; drafted a two-day course on *Questioning Techniques*; and written an SO entitled *Customs Intelligence Database*.

There has been more progress on the Pocket Notebook (PNB) tool. PNB is a 60-page physical (not electronic) notebook with provisions for recording information. After a PNB training and orientation for Customs intelligence officials on May 1, 2017, BTFA supplied about 750 PNBs to the Customs Intelligence and Investigation Directorate (CIID), which will distribute the PNBs to Customs officials throughout the country.

Conclusions: There is insufficient activity for the team to make conclusions about the impact of this task on trade facilitation.

Recommendations: BTFA should continue its efforts on this task.

7. POST-CLEARANCE AUDIT SYSTEM (PCA)

Findings: Article 5 of the TFA requires members to adopt or maintain a PCA system to ensure compliance with Customs and other related laws and regulations. At present, Customs is using only transaction-based PCA, reviewing documents for errors and following up with the relevant party, if necessary. BTFA provided three training sessions on PCA at the CHC, DCH, and

²⁴ *De minimis* refers to a minimum amount of an import that is not subject to duty (usually samples). The current *de minimis* amount is 1000 Taka, but it is not being implemented. The new Customs Act (2015) has set the *de minimis* amount at 2000 Taka.

Customs Valuation and Internal Audit Commissionerate. Custom officers who received BTFA's PCA training reported learning from their training and undertaking better-quality PCA as a result.

This task is now being shared with the ADB, which is assisting NBR in implementing system-based PCA.

Conclusions: The interviewed officials stated that BTFA's training was helpful for improved execution of their PCA duties. However, given the small number of officials trained, the team cannot quantify the impact of this BTFA task except to note that it is on the right track in providing needed support to Customs for transaction-based PCA until system-based PCA is introduced.

Recommendations: PCA is a key trade facilitation measure. BTFA should continue furnishing technical assistance for transaction-based PCA until implementation of systems-based PCA by the ADB.

8. CUSTOMS-BUSINESS PARTNERSHIPS

According to BTFA's 2014 Annual Report, BTFA assisted NBR in designing the AEO program and worked with the private sector to develop incentives and criteria for the AEO program. However, there were delays in implementation of the AEO program due to NBR concerns about incentives. Those issues have been addressed, and BTFA plans to resume working on AEO implementation in late 2017 (confirmed by NBR in a June 7, 2017 meeting with the team).

EVALUATION QUESTION I: CROSS-CUTTING ISSUES (GENDER)

Findings: BTFA has made outreach efforts to women, including two training sessions and one radio talk show. The Dhaka Women's Chamber of Commerce and Industry indicated that BTFA's assistance was well received.

Conclusions: BTFA has met its benchmarks in gender outreach.

Recommendations: BTFA can continue its outreach to women in two ways. First, if funding permits, BTFA could host an event for "Women in Trade," allowing women to learn about opportunities in trade and learn how to avail themselves of such opportunities, including obtaining access to finance. The event could feature successful female (and male) entrepreneurs in a round-table discussion followed by a question-and-answer session. Depending on the size of the event, it could include some displays of women's work. Invitees should include key government officials, representatives of financial institutions, traders, businesses, and women's groups.

A second strategy could reach out to women in rural areas through booklets distributed in business establishments, at CClS, and at related events. The booklets could provide information on how to engage in cross-border trade.

QUESTION I: SUMMARY OF FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

Summary Findings: Currently, BTFA's work plan includes 15 major tasks, eight of which resulted from the August 2016 realignment. Four tasks are cross-cutting. Of the 15 major tasks, seven are in the development stages.

Table 2. Tasks for IR 1

Activities	Success	Pending Success	Development	Remarks
Website	✓			Launched on September 20, 2017.
National Enquiry Point		✓		Scheduled for launch one month after website.
Customs Auction Procedures*			✓	See BTFA report on auction workshop. Online auction reform is needed. BTFA should coordinate with Customs House of Chittagong. NBR wants BTFA's assistance on this measure.
Non-Tariff Barriers*			✓	BTFA is in information-gathering stage.
SOPs, SROs, SOs, Customs Act*	✓	✓		New Customs Act and other regulatory matters are pending legislative action. There has been success in drafting auction procedures, while some regulatory drafts are still pending.
Brokers' Licensing Procedures*			✓	BTFA plans to submit report to NBR in September 2017. One NBR official said NBR does not need BTFA's assistance on this measure.
Advance rulings	✓			Launched on June 2, 2016; six classification advance rulings issued as of mid-May, 2017. Advance rulings will now include country of origin, per amendment in the 2017 Budget Measure.

*Tasks resulting from the August 2016 realignment.

Table 3. Tasks for IR 2

Activities	Success	Pending Success	Development	Remarks
Authorized Economic Operators program		✓		NBR to launch the AEO program in November 2017. The Asian Development Bank also has been working on AEO.
Customs-business partnerships		✓		NBR/BTFA worked with the private sector in establishing criteria for the AEO program
Risk Management		✓		BTFA has provided training. NBR must decide if BTFA or World Bank will implement systems-based risk management.
Trade Intelligence Capacity		✓	✓	Pocket Notebook published and training provided on selectivity. Case management and Customs trade intelligence capacity in development stages.
Expedited Shipment*			✓	NBR perceives this as an important task and wants BTFA's assistance.
Post-Clearance Audits		✓		Only transaction-based post-clearance auditing is in place. BTFA has provided training; the Asian Development Bank is working on system-based post-clearance auditing.
Pre-Arrival Processing*			✓	Assist NBR in development of pre-arrival processing plan. NBR perceives this as a key measure and wants BTFA's assistance.
Domestic Transit*			✓	Trading community not interested (importers, exporters, brokers). Domestic transit will become more important if/when BBIN-MVA is implemented. One NBR official told the team that BTFA cannot complete this task within the Activity's timeframe and that NBR does not need BTFA technical assistance.

*Tasks resulting from the August 2016 realignment.

Table 4. Tasks for Cross-Cutting and Additional Activities

Activities	Success	Pending Success	Development	Remarks
Project Newsletter	✓			Three newsletters have been published in last three years.
NBR Promotion To Mass Media			✓	BTFA is planning to place advertisements in newspapers about the website launch.
“Monetization” Of Project Initiatives			✓	BTFA’s FY 17 work plan states: “A ‘monetization exercise’ will be carried out to identify the effect of pre-arrival processing declarations on potential savings that could be made in trade.”
Gender-Based Trade Awareness Trainings	✓			BTFA has held two trainings for women and one radio show. The stakeholders were pleased.

Many of BTFA’s activities have not yet been implemented and, therefore, the team is unable to quantify their impact. In cases, where Customs officials received PCA training and others received RM training, officials interviewed reported that while the trainings were useful, they were too short, did not have enough hands-on activities, and they would have preferred the training in Bangla. The team notes that the latter point is outside BTFA’s control.

BTFA has taken steps to ensure long-term sustainability of its interventions by assisting NBR in forming committees. The team found that the trading community is generally unaware of the website, NEP, and the advance rulings.

Summary Conclusions: As Tables 2-4 show, BTFA has had some successes over the past three years. The successes so far are insufficient to have had a meaningful impact on trade facilitation in Bangladesh. However, BTFA’s has built some momentum during the past year. **If BTFA can successfully assist the GOB in implementing key trade facilitation measures it will most likely achieve its goals, to some extent, in the months ahead.**

Summary Recommendation: BTFA should try to sustain its momentum in its remaining months by prioritizing and focusing on key measures consistent with NBR’s priorities and express wishes,

The team recommends that BTFA engage NBR in prioritizing tasks, formulating timelines, and establishing benchmarks for the remaining time of the Activity. Doing so will impart a sense of ownership and foster potentially greater commitment by NBR to achieve specific tasks, benchmarks, and goals in the months ahead.

BTFA also should work with NBR to expand the scope of Article 275 of the new Customs Act to broadly cover “advance rulings” or “rulings” or, at a minimum, include “valuation rulings.”

BTFA and NBR should take steps to raise more awareness of the website, NEP, and the advance rulings, including more regular BTFA newsletters, publications, and events with the trading community, and use of poster, signs, and booklets at customs houses and CCI.

QUESTION 2: How effectively has BTFA developed a sense of ownership by the GOB of the reforms and improvements in trade-related processes?

Findings: The GOB, and specifically the NBR has shown a commitment to trade facilitation measures in most BTFA task areas, as, evidenced by the NBR’s adoption of the enhanced

Customs website and NEP, and its willingness to commit staff resources to update and maintain these functions. The NBR also is committed to issuing ARs, implementing the upcoming AEO program, and taking steps to codify authority for these measures by including them in the 2016 and 2017 Budget Measures. NBR is supporting BTFA's efforts to form key committees; adopt SROs, SOPs, and the new and pending Customs Act; and use the manual prepared by BTFA.

NBR expressly has requested BTFA's continued support in implementing PAP, expedited shipment, and auction reform. Further, NBR wants support from BTFA together with the ADB for the AEO program and PCA. However, the team found some uncertainty about NBR's commitment to work with BTFA given one official's comments that NBR does not need BTFA's assistance to update SROs, reform broker licensing, or address DT. With respect to RM, NBR told the team that it will select a donor to assist in automating this procedure.

Conclusions: BTFA has succeeded in fostering a sense of ownership by NBR and the GOB for most of its activities, as evidenced by NBR's formation of key committees, codification and implementation of reforms, issuance of SROs for ARs, work toward implementation of the AEO program, and imminent launch of the Customs website and NEP portal. However, it remains uncertain whether NBR's sense of ownership extends to BTFA's RM efforts.

Recommendations: BTFA/USAID should clarify, as soon as possible, NBR's intent regarding BTFA's role for implementation of a computer-based risk RM to avoid potential duplication of effort between donors.

EVALUATION QUESTION 3: To what extent will the outcome of BTFA interventions likely result in increased trade volumes?

Findings: BTFA's implementation of select trade facilitation measures contained in IR1 and IR2 is designed to provide transparency and access to trade information and reduce supply trade barriers. These measures are expected to *bolster economic growth (see Figure 1) by creating greater efficiency in cross-border trade and enhanced market access by reducing time and costs of trade.*²⁵ The development hypothesis states, in part, what will occur if a particular intervention is undertaken.²⁶ The team tested this hypothesis to answer Question 3, relying on first-hand information from stakeholders and beneficiaries and secondary information from studies and other documents. The team found that, across the board, companies of all sizes and commodities unanimously voiced the opinion that BTFA's interventions under IR1 and IR2 would reduce trading costs and save time, leading to greater trade flows. Customs and port authority officials held similar views.

As an example, in one case, a private sector manufacturer/exporter with more than 30,000 employees stated unequivocally to the team that BTFA's trade facilitation activities, if implemented, would not only save time, decrease costs, and increase trade volume, but also would attract more foreign direct investment to Bangladesh. This in turn, he said, would create employment and spur economic growth, improve social conditions, and provide stability.

The team is unable to provide quantitative findings on the likely extent of any trade increases because a number of other factors limit the impact of trade facilitation measures implemented in Bangladesh. These include the lack of a cadre of skilled and trained customs officials, and the

²⁵ BTFA scope of work.

²⁶ USAID Development Hypothesis, <http://usaidprojectstarter.org/content/development-hypotheses>.

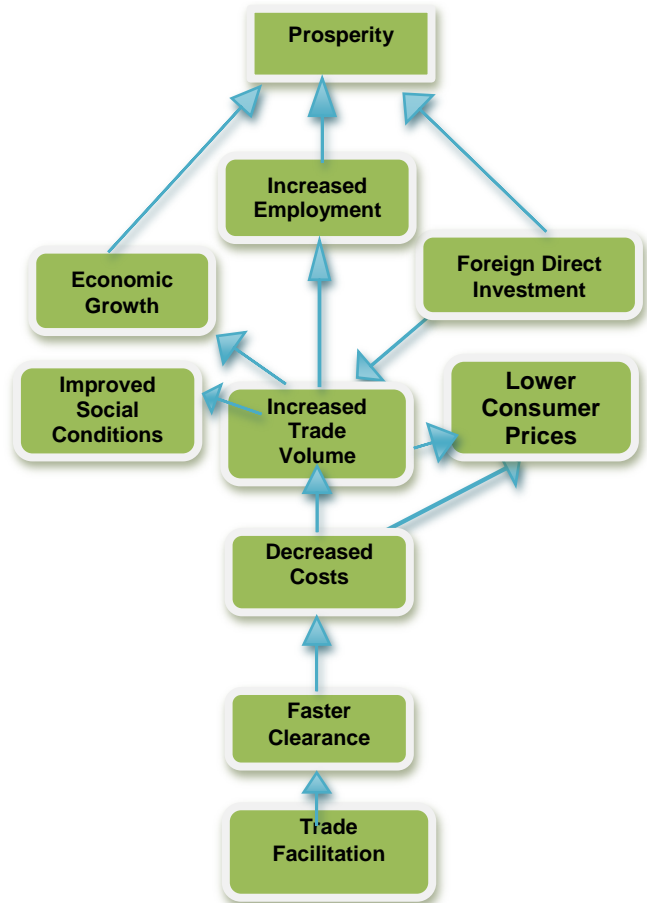
need for improved infrastructure (including equipment, road and rail infrastructure, and telecommunications). In addition, supply and demand chains can also influence trade flow.

Studies support the team’s first-hand findings. For example, it is well accepted that reducing supply chain barriers lower costs, results in lower prices (both to consumers and companies), and increases trade flows.²⁷ According to the *WTO World Trade Reports 2015*, the range of trade cost reduction will be between 9.6 percent and 23.1 percent.²⁸

Increased trade is also directly linked to foreign direct investment, better revenue collection, and reduced corruption, which in turn can lead to economic growth and improved social conditions.²⁹ An UNCTAD report titled *Trade Facilitation and Development* states that “[B]y reducing trade costs, trade facilitation provisions can promote the entry of small and medium-sized enterprises into export markets, particularly trade taking place in global value chains, by allowing them to specialize in tasks and new types of inputs, thereby diversifying their exports.”³⁰ As also noted in the *WTO World Trade Report 2015*, “[t]rade facilitation reforms help boost government revenues by increasing trade flows, hence expanding the tax base, increasing tax collection efficiency for any given level of imports, and increasing detection of customs fraud and corruption.”³¹

Further, trade facilitation efforts have a far more powerful impact on increasing both trade flows and gross domestic product (GDP) than reducing tariffs (see Figure 2).³²

Figure 1: Development Hypothesis



²⁷ See Makki, Shiva S., supra.; *MAXIMISING BENEFITS, MINIMISING COSTS*, OECD, 2002; <https://www.oecd.org/investment/investmentfordevelopment/1959815.pdf>.

²⁸ *WTO World Trade Report 2015*, p. 7.

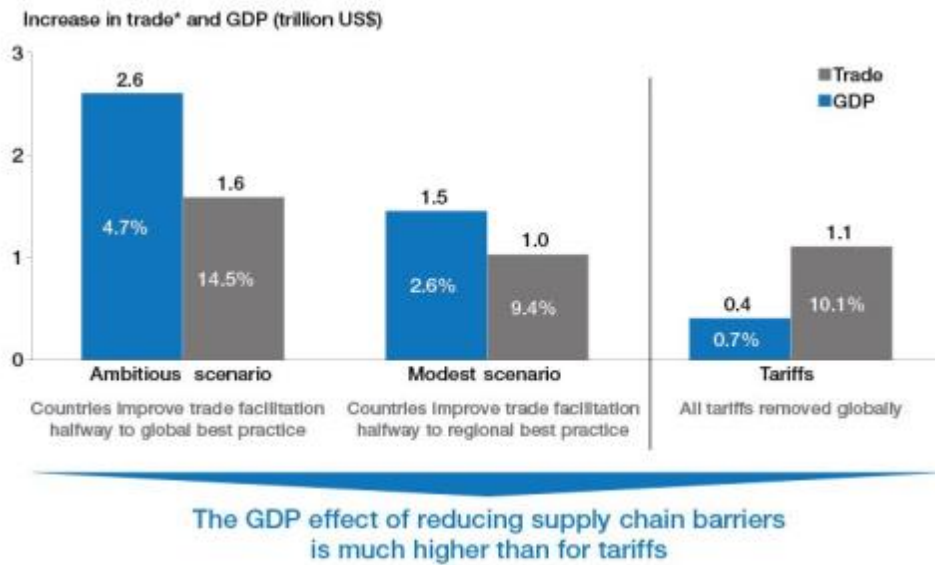
²⁹ *Ibid.*

³⁰ *Trade Facilitation and Development*, UNCTAD/DTL/TLB/2016/1 United Nations, 2016. See also, *WTO World Trade Report 2015*, p. 10.

³¹ *Ibid.*, p. 9.

³² WTO’s Trade Facilitation Agreement enters into force, https://www.wto.org/english/news_e/news17_e/fac_31jan17_e.htm. See also, *Trade Facilitation and Development*, UNCTAD/DTL/TLB/2016/1 United Nations, 2016.

Figure 2: Impact of Trade Facilitation Efforts



Source: World Economic Forum. *Based on export value; includes only the effect of “border administration” and “telecommunication and transport infrastructure.”³³

Meaningful interventions produce a meaningful impact. In a report titled *Enabling Trade, Valuing Growth Opportunities*, the World Economic Forum notes that it is possible to achieve trade increases by reducing supply chain barriers only by reaching specific “tipping points.” In other words, countries make progress in discrete steps, and small incremental changes may have minimal effects until a tipping point is reached.³⁴ Efforts also have to be combined because one trade facilitating measure might have only a minimal impact. Meaningful impact is experienced only when sufficient conditions have been met, i.e., the “tipping points.” BTFA’s tasks include sufficient trade facilitation measures accepted as critical for reducing time and lowering costs. The specific BTFA measures, if fully implemented, would most likely represent a “tipping point.”

Conclusions: Despite the limitations noted above, the team concludes, based on field findings and supported by research and secondary studies, that the BTFA-supported reforms currently being undertaken under IRI and IR2 would most likely lead to increased trade volumes, if fully implemented.

Recommendations: BTFA should focus on implementing key tasks, especially those tasks that can be accomplished within the remaining period of performance, after assessing, together with NBR, those tasks to which NBR is committed.



Chittagong Customs House Team Meeting

³³ *Enabling Trade, Valuing Growth Opportunities* World Economic Forum, 2013.

³⁴ Ibid.

EVALUATION QUESTION 4: *What challenges has BTFA faced in implementing its activities, and how has BTFA responded to those challenges? Are there any recommended alternatives to these approaches??*

Findings: The challenges facing BTFA appear to include the time it takes for NBR to respond to BTFA, lack of donor coordination, and duplication of efforts within Customs, for example, the CHC.

With respect to the time it takes for NBR to respond to BTFA, NBR has stated that it would like to have input and help coordinate BTFA's timeline for meeting benchmarks and implementation activities. Engaging NBR in formulating timelines would potentially impart a sense of ownership and build commitment for the specific task or benchmark and could serve to improve NBR's response time to BTFA.

NBR told the team that one reason for delays in implementing procedures is because different donors offer differing methods and ideas, and "nothing gets done."

An example of a need for donor coordination is noted in the team's response to Evaluation Question 1. Both BTFA and the WB are working with the NBR on implementing an automated RM system. NBR told the team that it has yet to decide which donor it will select for RM. While there may be some overlap between BTFA and ADB efforts on implementing PCA systems, the division of tasks there seems to be more clearly defined.

Conclusions: There is a serious lack of donor coordination on the part of NBR. However, donors, including USAID, must take some responsibility to ensure that there is less duplication of donor efforts. For example, USAID/BTFA coordination appears to have been relatively successful with ADB, but much less so with the WB. In addition, whereas NBR is committed to most of BTFA's tasks, there is a lack of coordination among NBR's Modernization Unit, BTFA, and the local Customs houses.

Recommendations: USAID/BTFA should insist on holding regular meetings with other donors and encourage NBR to coordinate donor activities. BTFA should also coordinate with the NBR's Modernization Unit and the local Customs houses. The team recognizes that this can be challenging, particularly when larger Customs houses initiate activities and want ownership of those activities.

If feasible, BTFA should consult with NBR in formulating timelines for meeting benchmarks and goals. This has the potential to impart NBR with a sense of ownership and build commitment to specific tasks or benchmarks, perhaps improving and facilitating NBR's response time.

With respect to duplication of Customs efforts, such as CHC working independently of BTFA on auction reform, the team recommends that BTFA continue to work with the NBR's Modernization Unit for greater coordination.

EVALUATION QUESTION 5: *What future trade-related interventions (either current BTFA activities requiring additional support or new activities that are not part of BTFA's scope of work) would be necessary or very helpful to achieve the overarching objective of greater economic growth through increased trade?*

Findings: The team identified a wide range of barriers to trade facilitation. These include Customs policies, lack of infrastructure, incomplete implementation of ASYCUDA World, lack of proper warehouses and storage facilities, inadequate port facilities, unsynchronized working hours, acute shortages of human capacity, untrained Customs officials, uninformed traders and brokers, inadequate lab facilities, and lack of scanners and equipment, to name just some of the barriers.³⁵

The team identified six issues and associated remedies that would help achieve the overarching objective of greater economic growth through increased trade: (1) rolling out ASYCUDA across borders and ports; (2) balancing revenue targets and trade facilitation; (3) minimizing impact of Customs officials' rotation on Customs performance; (4) synchronizing Customs working hours and fostering interconnectivity at borders; (5) improving Customs training; and (6) promoting women in trade.

ROLLING OUT KEY ASYCUDA MODULES ACROSS BORDERS AND PORTS

Findings: Of the key ASYCUDA World modules, PAP is almost non-existent in Bangladesh, and RM and PCA are not uniformly managed at all borders and ports. System-based RM would allow consistent procedures for all imports and exports and would be significantly faster and more accurate than comparing a given set of data (e.g., from a goods declaration) against all currently active risk profiles (transaction-based).³⁶

A system-based PCA would control only those activities relevant to determining admissibility upon arrival of the goods to the border, thereby saving time. In its guide to implementing PCA, the United Nations Economic Commission for Europe (UNECE) notes that PCA "can lead to a significant increase in revenue collection [*emphasis added*], as PCA allows a more comprehensive and holistic evaluation of the particulars necessary for the calculation of duties and taxes. In Japan, for example, increased use of PCA generated more than twice as much revenue in 2009 compared to revenue generated in 1999."³⁷

Using system-based procedures would likely result in less need for examination, thereby permitting cargo to proceed faster to its destination. This would reduce the need for scarce, harsh, and insecure storage space, also reducing damage and pilferage of cargo during storage. System-generated assessments and determinations also would provide protection for Customs officials and enable them to perform their duties more effectively with less fear about harm to their professional reputation (see more under next section).

Conclusions: Implementing key ASYCUDA WORLD modules and platforms for RM, PCA, and PAP at all borders and ports would lead to faster, more transparent, and more uniform Customs clearances, reduced costs, and most likely increased trade flows and an improved investment climate for both foreign and local investment. This, in turn, would create employment, increase economic growth, and improve existing social conditions.³⁸

³⁵ The team acknowledges that road, rail, and shallow ports are also barriers to trade facilitation but are not addressing large infrastructure needs.

³⁶ *Trade Facilitation Implementation Guide, Customs Risk Management and Selectivity*, UNECE <http://tfig.unece.org/contents/customs-risk-management.htm>.

³⁷ *Trade Facilitation Implementation Guide, Post Clearance Audit*, UNECE, <http://tfig.unece.org/contents/post-clearance-audit.htm>.

³⁸ See, Makki, Shiva S. *Supra*

Recommendations: In addition to its ongoing activities (such as online auction, expedited shipments, and AEO program), BTFA should facilitate implementation of the three key ASYCUDA World modules at all borders and ports before the close of the Activity. The team recognizes that the ADB is responsible for implementing systems-based PCA. BTFA should clarify with NBR its role on system-based RM. BTFA should continue its efforts to implement PAP before the Activity ends.

BALANCING REVENUE TARGETS AND TRADE FACILITATION

Findings: NBR emphasizes revenue collection over trade facilitation. Finding a balance between facilitating trade and collecting revenues is a daunting task and requires policy changes and a cultural shift at NBR. Research widely supports the conclusion that trade facilitation actually results in increased revenue collection.³⁹



Bhomra Customs House

Conclusions: NBR's revenue collection targets harm trade facilitation in Bangladesh and have a chilling effect on Customs officials' ability to execute their duties.

Recommendations: A new follow-on activity could work with NBR on adopting a policy of realistic revenue collection targets while promoting a culture of facilitating trade rather than maximizing revenue collection. As a precursor, a study could be done on the impact of trade facilitation measures on revenue collection in Bangladesh. Such a study would likely demonstrate that implementing key trade facilitation measures will increase national revenue collection, thereby reassuring the GOB of revenue generation.

MINIMIZING IMPACT OF STAFF ROTATION ON CUSTOMS PERFORMANCE

Findings: Customs has a rotation system whereby Customs officials are rotated in an uneven scheme of transfers through the Customs, Revenue and Value Added Tax (VAT) agencies. NBR should consider implementing a system whereby Customs officials rotate only in Customs, and VAT officials rotate only in VAT. A comparable approach has been implemented in the Plant Quarantine Wing of the Department of Agricultural Extension under the Ministry of Agriculture, where Plant Quarantine officials rotate only in Plant Quarantine.⁴⁰ According to officials there, this policy has made a marked difference in sustaining a cadre of trained officials and building institutional knowledge and capacity.

The Chairman of NBR told the team that NBR plans to establish career paths for officials in the various Customs areas such as RM and PCA. BTFA has long supported specialty areas for Customs officials. If NBR truly supports such an approach, this might be an opportunity for BTFA to work with NBR to implement a system of career paths, including limiting the rotation of Customs officials only to Customs and not rotating in VAT.

³⁹ 2015 World Trade Report, *supra*.

⁴⁰ Interview with Plant Quarantine officials, Dhaka (28 May 2017)

Conclusions: As Customs requires technical knowledge that only hands-on experience can confer, the current system is incompatible with retaining a cadre of trained officials in Customs functions, creates inefficiencies and hampers trade facilitation.

Recommendations: To the extent feasible, BTFA can propose to work with NBR to fulfill the Chairman’s goals of having a cadre of officials with specific expertise who would remain in their positions and build on their specific expertise. BTFA can also propose that NBR adopt a more measured approach to rotation, considering the example being used at the Plant Quarantine Wing.

SYNCHRONIZING CUSTOMS WORKING HOURS AND FOSTERING INTERCONNECTIVITY AT BORDERS

Findings: Many traders and port authorities complained to the team about unsynchronized Customs working hours that cause delays to their trading. These delays result not only in time lost but damage to cargo and increased costs. Port operators in Mongla complained that this resulted in having to store containers when there was already an acute shortage of storage space. Customs officials in Benapole stated that their hours were set to when trucks were due to arrive from Haridaspur, India, and that was the reason for their late opening hours. A large company engaged in importing and exporting food products said that border delays, lack of storage facilities, and poor road infrastructure were prevalent, especially in Benapole, Akhaura, Burimari, and Sheola, where imports were delayed and damaged while awaiting Customs clearance.



Trucks Arriving from Haridaspur, India, to Benapole, Bangladesh

The Bangladesh Navy, which is responsible for clearing dangerous goods,⁴¹ also expressed the need for more synchronized hours. A separate issue that might be affecting the lack of synchronized hours is that there are not enough Customs officials in the workforce.

Conclusions: The lack of synchronized hours and interconnectivity between Customs, port operators, and private sector businesses has a heavy negative impact on trade facilitation in Bangladesh. Even small changes in synchronizing hours of operation and more interconnectivity could have a significant positive impact on trade facilitation and reduce time and costs.

Recommendations: USAID and NBR should consult with the private sector to determine needs, feasibility, and efficient means to synchronize hours of Customs operations; build software connectivity between Customs land borders, ports, and port authorities; and foster cross-border cooperation with border and port authorities, the Navy, and other entities responsible for Customs clearance. Given the limited time left and other tasks to complete for the BTFA activity, the team recommends that this task be part of a follow-on activity

⁴¹ The import list contains 3,511 goods that are designated as International Maritime Dangerous Goods (including alcohol). The Navy expressed that the Import Policy list regarding dangerous goods should be reviewed and modified according to international standards since many of the items on the list are not normally on the list of most countries.

IMPROVING CUSTOMS TRAINING

Findings: The Bangladesh Training Academy conducts regular training, but wide disparities remain in competence of Customs officials. The trainings are conducted as directed by NBR, and the Academy has little control over its activities and faculty. However, there is a new 17-member Board of Directors at the Academy, headed by the Chairman of NBR, and including representatives of the public and private sectors and universities. The Chairman stated that improving the Training Academy is very important to him.



Chittagong Training Academy

Conclusions: With a new Board at the Academy and the NBR Chairman's stated commitment to improving both the Academy and training for officials, there is an opportunity for BTFA to influence future training activities, including implementing a permanent faculty at the Academy.

Recommendations: BTFA can seize this opportunity, to the extent feasible, to work with the Chairman/NBR to improve training. The first step would be to review the Academy's new organizational structure to determine its feasibility and effectiveness in providing training. BTFA should also work with the Academy toward implementing a permanent faculty, which would likely improve training effectiveness or, at a minimum, raise the Academy's prestige, thereby attracting talented faculty.

Both Academy and Customs field officials stated that more training is needed. BTFA's training can supplement the Academy's training. However, some officials who had received BTFA training said the training would have been more beneficial had it been longer and more hands-on. To the extent possible, BTFA might continue providing training, in Bangla or with simultaneous translation. This will require assessing the Academy's capacity and needs as well as BTFA's resources. The team does not have sufficient information to quantify the amount of increased training needed.

PROMOTING WOMEN IN TRADE

Findings: The primary barriers to women in trade are a lack of access to finance and a lack of information, knowledge, and training. Even when women (and men) are able to obtain small loans to start a business, the interest rates are prohibitively high, and this makes it difficult for the business to survive. In addition, doing business in Bangladesh is very costly for all sizes of business, due to the VAT and other fees.

Conclusions: Small business centers (SBCs) can equip women (and men) with the information and skills needed to engage in cross-border trade.

Recommendations: For a new activity, USAID can consider setting up SBCs in conjunction with the Bangladesh Women Chamber of Commerce and Industry. This could be a small activity, in the form of a grant. Each center does not have to be open every day but could be

open on a scheduled basis so that there is certainty and predictability for women (and men) to obtain information.

LESSONS LEARNED

BTFA should engage in greater outreach efforts to targeted groups at public events, as well as placing booklets and signs about the website and NEP at Customs Houses throughout the country. To the extent feasible, BTFA could also have joint activities with the CCIs as well as using social media to promote the website and important customs services.

BTFA should consider conducting training in Bangla or, if that is not possible, simultaneously in both Bangla and English. The team heard time and again that BTFA's training was good, but that it would have been better in Bangla. Although a large percentage of Bangladeshis speak English, technical subject matter such as Customs procedures is difficult for many to follow in English. BTFA countered that before-and-after test results confirmed that trainees understood the subject matter and that their feedback indicated that they were comfortable with presentations in English. BTFA affirms that the national staff conducts trainings in English because trainees have no difficulty in English comprehension.

It is possible that some trainees understand presentations in English as well as in Bangla. However, the majority of the team⁴² independently arrived at the conclusion that BTFA should consider using an anonymous questionnaire to ask trainees whether it would be more effective to have training in English or Bangla.

⁴² Initially, each team member independently came to the same conclusion. However, one team member had a change of heart after speaking to BTFA and ACME staff, and no longer believes that the training should be conducted in Bangla. The team member recommends that the "trainings should be conducted in English with a translator present to clarify language issues." The rest of the team stands by the original finding and conclusion.

ANNEX I: EVALUATION METHODOLOGY

The BTFA scope of work required the team to address five evaluation questions. The team provided answers to the evaluation questions using the methodology described in the Evaluation Design Matrix (Annex I, Table I). This methodology included document review, direct observations and site visits, key informant interviews, focus group discussions, surveys, and a staff self-assessment. BTFA's activity work plans, benchmarks, and program reports were collected and performance indicators analyzed.

Team members focused on the elements relevant to their assigned tasks (see Annex 5). The team triangulated the data across activities and extracted findings, which were used to answer the evaluation questions.

DOCUMENT REVIEW

The team conducted in-depth document reviews, including quarterly and annual reports, monitoring data, baseline reports, gap analyses, training reports, capacity-building reports, and other BTFA deliverables and documents. The team also reviewed available and relevant third-party reports and analyses (OECD, World Bank, WTO, government trade statistics).

The team reviewed secondary data to provide data and input to address the evaluation questions and comply with other requirements to substantiate evaluation findings. The document review also made it possible to compile and compare planned versus actual outputs and activity-level outcome data.

DIRECT OBSERVATION AND SITE VISITS

To the extent feasible, the team used direct observation of the BTFA's implementation activities to validate BTFA's accomplishments with findings derived from documentation and interviews. Examples of direct observation included observing training sessions being conducted at the Customs Intelligence Investigation Directorate (CIID) on June 1, 2017 on pre-delivery; observing customs clearance procedures at ports and borders during site visits; and examining the architecture of the enhanced Customs website, along with database, security, and other information technology components of the National Enquiry Point. Direct observation is useful to triangulate findings using the expert judgment of the evaluation team to identify anomalies and "ground truth" in reported findings.

KEY INFORMANT INTERVIEWS

The team conducted key informant interviews, both by telephone and in person with USAID and BTFA staff, NBR officials, Customs Commissioners at field visits, and port authorities and the USAID Asia and Middle East Economic Growth Best Practices Project (AMEG).

Some interviews were conducted in the field visits in Dhaka. The team also traveled to Benapole, Jessore, Bhomra, Khulna, Mongla, and Chittagong, where the team interviewed Customs Commissioners, port officials, Plant Quarantine officials, Chambers of Commerce representatives, customs brokers, shipping agents, and representatives of individual, small, medium, and large companies.

Private-sector key informants included private-sector beneficiaries and stakeholders:

- Traders (both exporters and importers), including individual, small, medium and large traders (including Bangladesh Garments Accessories & Packaging Manufacturers and Exporters' Association or BGAPMEA, Bangladesh Association of Pharmaceutical Industries [BAPI], agricultural processors, and traders of agricultural commodities)
- Shipping lines and associations
- Couriers (DHL, FedEx, etc.)
- Container depot, clearing, and various freight forwarding associations
- Customs brokers
- Various Chambers of Commerce (e.g., Foreign Investors Chamber of Commerce and Industry, Dhaka Chamber of Commerce, South Asian Federation of Chambers of Commerce, Dhaka Women Chamber of Commerce and Industry)
- Women Entrepreneur Association of Bangladesh (WEAB)
- Bangladesh Foreign Trade Institute
- Pran Foods Ltd
- Bangladesh Export Processing Zones Authority (BEPZA)
- Policy Research Institute (PRI)
- Bangladesh Fruits Vegetables & Allied Products Exporters Association
- Bangladesh Trade Policy Support Program (BTPSP)

In preparation for the interviews, the team developed interview protocols that outlined the purpose, structure, and a list of questions. The team used best practices and interview guidelines while interviewing respondents to ensure that the questions were clearly worded, sequenced effectively, and asked in a neutral manner to elicit valid and reliable responses. The evaluators documented the discussions by taking detailed notes. (Annex 2 contains the interview questionnaire.)

FOCUS GROUP DISCUSSIONS

The focus group discussions ranged in size from small (4-6 persons) to medium (8-10 persons) and included varying categories of stakeholders and beneficiaries to obtain first-hand information on the impact of BTFA's activities and to accumulate relevant field data. The team developed questions for the specific categories of beneficiaries and stakeholders. For example, a focus group might have consisted of representatives from small, medium, and large companies (see Annex 2, Part 3). These interviews enabled the evaluators to assess differing perspectives among the categories of stakeholders and beneficiaries.

SURVEY INSTRUMENTS

The BTFA survey instruments (see Annex 4) were designed to obtain quantitative and qualitative data to provide responses to the evaluation questions. The intention of the survey instruments was to validate accomplishments of indicator targets by BTFA and to assess and quantify the impact or outcome of BTFA's interventions with respect to Evaluation Questions 1, 2 and 3. The questions were designed to obtain information about the impact of BTFA's activities relating to:

- Improvements in the GOB's ability to provide reliable information efficiently and transparently to the business community, consistent with the GOB's WTO and WCO obligations;

- Impact of BTFA on the private sector business engaged in international trade in terms of reducing time and costs of international trade;
- Impact of BTFA's activities on increasing cross-border trade volume, particularly in agricultural commodities;
- Sustainability of BTFA's activities and outcomes; and
- Barriers to BTFA's activities.

The list of interviewees included (but was not limited to) the following:

1. USAID staff
2. Implementers' staff
3. Government officials/National Board of Revenue
4. Private sector beneficiaries: individual, small, medium, and large businesses
5. Chambers of Commerce, including the Dhaka Women Chamber of Commerce & Industry
6. Shipping companies, including expedited courier shippers and customs brokers
7. Donors and collaborators
8. Women's associations

SELF-ASSESSMENT

A self-assessment questionnaire (Annex 2, Part 6) was provided to each member of the BTFA team. The questionnaire requested BTFA staff views on the five evaluation questions and provided an opportunity to share any other information they wished to be considered. In addition, the evaluation team's assessment (ranking of -3 to +3) of the achievement or lack of achievement of results as shown for the 15 sub-activities with 29 indicators [FY1] was shared with BTFA staff for comment.

LIMITATIONS

The methodology relied on the availability of documents, including program and beneficiary records, data collection forms, and the availability of appropriate interviewees.

Table 1. BTFA Evaluation Design Matrix

#	EVALUATION QUESTIONS	DO (Direct Observation)	DR (Document Review)	PBR (Program and Beneficiary Records)	IP (Implementing Partners)	KI - GOB (Key Govt)	DN (Donors)	KI-PS (Key Informants- Private Sector)	SA (Self - Assessment)	FGDs (Focus Group Discussions)
A.	IR 1 and IR 2									
1.	<p>To what extent is BTFA on track, in terms of progress and outcomes, to meet its overall objective? The response to this question should (at a minimum) address the following:</p> <ul style="list-style-type: none"> • Improved availability, transparency, and utilization of trade-related information by the private sector • Tangible improvements in efficiency (i.e., reduced time and cost) of trade-related processes • Design and implementation of the technology components of the activity, including the new Customs website, risk analysis and case management system, auction system, etc. 	x	x	x	x	x		x	x	x
2.	How effectively has BTFA developed a sense of ownership by the GOB of the reforms and improvements in trade-related processes?		x		x	x				x

#	EVALUATION QUESTIONS	DO (Direct Observation)	DR (Document Review)	PBR (Program and Beneficiary Records)	IP (Implementing Partners)	KI - GOB (Key Govt)	DN (Donors)	KI-PS (Key Informants- Private Sector)	SA (Self - Assessment)	FGDs (Focus Group Discussions)
3.	To what extent will the outcome of interventions likely result in increased trade volumes?				X	X	X	X		X
4.	What challenges has BTFA faced in implementing its activities and how has it responded to those challenges? Are there any recommended alternatives to these approaches?	X	X	X	X	X	X	X		X
5.	What future trade-related interventions (either current activities requiring additional support or new activities that are not part of BTFA's scope of work) would be necessary or very helpful to achieve the overarching objective of greater economic growth through increased trade?	X	X	X	X	X	X	X	X	X

Key	Abbreviation	Key Function – Obtain Quantitative and Qualitative data
DO	Direct observation	First-hand information observing trainings, workshops, tasks, etc.
DR	Document review	Task order, monitoring and evaluation plans, performance results, relevant reports, including third-party reports.
FGD	Focus group discussion	Stakeholders from diverse public and private sector groups enabling the evaluation team to obtain data from a broad cross-section.

Key	Abbreviation	Key Function – Obtain Quantitative and Qualitative data
DN	Consultations with other donors’ activities (e.g., USAID, World Bank, Department for International Development [DFID], the European Commission [EC], German Corporation for International Cooperation [GIZ], Central Asia Asian Development Bank [ADB], UNCTAD, etc.)	Donors who undertake related activities or have the opportunity to observe impact of BTFA’s technical assistance and/or training; users of NBR’s website who can comment on the website’s user-friendliness and availability of transparent information on the website.
IP	Implementing partner	IBI International, Nathan Associates (BTFA staff).
KI- GOB	Interviews and meetings with key informants	National Board of Revenue, land, air, and seaport officials and government beneficiaries, including recipients of training and technical assistance within relevant Bangladesh government entities. Also, GOB offices engaged in consultations and meetings with BTFA.
KI-PS	<p>Interviews with private-sector beneficiaries and stakeholders:</p> <ul style="list-style-type: none"> • Traders (exporters and importers), individual, small, medium, and large industries (including Bangladesh Garments Accessories & Packaging Manufacturers and Exporters’ Association [BGAPMEA], Bangladesh Association of Pharmaceutical Industries [BAPI], etc.) • Shipping lines and associations (e.g., MAERSK) • Couriers (DHL, FedEx, etc.) • Container depot, clearing and various freight forwarding associations • Customs brokers • Various Chambers of Commerce (Foreign Investors Chamber of Commerce and Industry, Dhaka Chamber of Commerce, South Asian Federation of Chambers of Commerce, Dhaka Women Chamber of Commerce & Industry) • Women Entrepreneur Association of Bangladesh (WEAB) • Bangladesh Foreign Trade Institute • Pran Group • South Asian Association for Regional Cooperation 	<ul style="list-style-type: none"> • Private-sector users of the Customs website. • Traders and companies that requested or are interested in advance rulings, traders who are likely to participate as Authorized Economic Operators (AEOs). • Users of customs functions and services, representatives who work with or have the opportunity to observe those who have received training and/or who might be affected by reforms or government actions resulting from BTFA’s technical assistance.

Key	Abbreviation	Key Function – Obtain Quantitative and Qualitative data
	(SAARC) <ul style="list-style-type: none"> • Bangladesh Export Processing Zones Authority (BEPZA) • Policy Research Institute (PRI) • Bangladesh Fruits Vegetables & Allied Products Exporters Association • USAID - AMEG Project • Bangladesh Trade Policy Support Program (BTPSP) (EC) • Participants in BTFA's events and activities, to the extent available 	
PBR	Program beneficiary records	Results and impact of BTFA's tasks.
SA	Self-assessment	Obtain information from implementing partners.

ANNEX 2, PART 1: QUESTIONNAIRE FOR GOVERNMENT OFFICIALS – NATIONAL BOARD OF REVENUE

Enhanced Customs Website

1. The Enhanced Customs Website will be formally launched June 14, 2017. What challenges do you see in maintaining the website?
2. What steps do you think are required to overcome those maintenance challenges? If applicable, in what way could BTFA provide further assistance? (EQ 1,4)
3. Is the Enhanced Customs Website technology robust, meaning that is secure and reliable? Is there an appropriate plan and commitment in place to sustain the technology? (EQ 1,4)
4. Does NBR have the capacity to regularly maintain and update the website with new information? If yes, how important is this assistance to this NBR's function? Does NBR have the capacity to provide this service without BTFA's technical assistance? Has BTFA provided the knowledge and the skills transfer to sustain the website? (EQ 1,4)

Non-tariff Barriers to Trade

5. What does NBR see as the primary barriers to cross-border trade, and agricultural trade in particular? (EQ 3,5)
6. Does NBR believe that reducing NTBs in agricultural trade will increase the volume of trade? If yes, will NBR devote the needed resources to those reforms within its control implement this reform? (EQ 3,5)

Auction Procedures

7. It has been reported that auction procedures vary from area to area and it can also be burdensome for interested parties to bid on auctions. Is BTFA assisting NBR on auction reforms? If yes, what do you think will be the impact of such reforms on the business community and revenue collection? (EQ 1,5)
8. How feasible does NBR think it is to implement on-line bidding? (EQ 1,5)
9. Does NBR view auction reform as a priority? (EQ 1,5)

Risk Management

10. Has BTFA provided technical assistance in developing/reforming risk management procedures? If so, how effectively did BTFA provide this technical assistance? (EQ 1)
11. What are challenges in implementing risk management? Are customs field officers properly trained in risk management? (EQ 1,4)
12. Does NBR believe that improved risk management will result in reducing costs and time for international trade? If yes, do you have any estimates? (EQ 2,3)

13. Is NBR committed to implementing risk management methods or systems? If yes, will NBR devote resources to implementing these reforms? If no, why not? (EQ 1,4)

Post-Clearance Audit

14. Has BTFA provided technical assistance in developing/reforming post clearance audit procedures (PCA)? If so, how effectively did BTFA provide this technical assistance? (EQ 1,2,4)
15. Does NBR believe that post clearance audit reforms will result in reducing costs and time for international trade? If yes, do you have any estimates? (EQ 3,5)
16. Is NBR committed to implementing post clearance audit reforms? If yes, will NBR devote resources to implementing these reforms? If no, why not? (EQ 1,4)

Pre-Arrival Processing

17. Does NBR believe that Pre-Arrival Processing (PAP) of Import Declarations is another reform measure that will benefit both the government and the private sector in reducing costs and time? (EQ 2,3,4)
18. Is NBR committed devoting resources to implementing PAP? Will this NBR service be available to the courier industry? (EQ 1,4)

Authorized Economic Operators

19. Is NBR's AEO activities action plan finalized (up to 2018)? If yes, did BTFA provide assistance and what was the impact of that assistance facilitating NBR's functions in this area? (EQ 1,2,3).
20. Has BTFA provided training or technical assistance on AEO?
21. The AEO program is expected to begin with the pharmaceutical sector. When does NBR expect this to become operational? What are the next sectors in line and why those sectors? (EQ 1,2,4)
22. What impact do you believe AEO will have on the trading community? On the volume of trade? On reducing costs and time? (EQ 1,3)

Domestic Transit

23. Is BTFA assisting NBR in domestic transit reforms? If yes, what impact do you think such reforms will have on trade? (EQ 1,3)

National Enquiry Point

24. How effective has BTFA been in assisting NBR on establishing the National Enquiry Point? The NEP is expected to become operational in the coming weeks- Is NBR devoting the resources to meet trader's demands in a timely manner? (EQ 1,2,4)
25. Does NBR have the human capacity in place to respond timely to businesses' requests? (EQ 1,2,4)

Law and SROs

26. Has BTFA provided technical assistance on developing the New Customs Act? What is the status of the new Customs Act and when does NBR expect the draft to become law? (EQ 2,4)
27. What are NBR's back-up plans if the New Customs Act is held up for passage? (EQ 2,4)
28. Has BTFA provided technical assistance on legislation, SRO's, customs modernization and harmonization? Brokers' licenses? If yes, how helpful was this assistance? What impact do you believe these reforms will have on the trading community? (EQ 1,2,4)

Advance Rulings

29. Has BTFA assisted NBR in capacity building and implementing advance rulings? If so, how effective and efficient has BTFA provided this technical assistance and capacity building? How does NBR plan to sustain this activity after BTFA closes? (EQ 1,2,4)
30. Is NBR/Customs issuing advance rulings? Is staff independently preparing advance rulings?(EQ 1,2)
31. What impact do you believe advance rulings will have on the trading community? On the volume of trade? (EQ 3,4)
32. Has NBR devoted resources to ensure that it can respond timely to the business community Advance Rulings request? (EQ 1,2)

Courier Services

33. Courier companies deliver valuable services to businesses of all types and sizes thereby adding value to the national and global supply chain. However, they are viewed with discomfort, if not distrust, by some government authorities in Bangladesh. What can be done to build trust between the government and courier companies? (EQ 4,5)
34. Some of the challenges courier services face include short customs workdays, which present barriers to their expedited delivery services. What steps can NBR take to address these obstacles that the industry faces? (EQ 4,5)
35. Is customs committed to implementing a de-minimus amount on dutiable transactions for the expedited shipping industry? (EQ 4,5)

Customs Brokers

36. Reports indicate that obtaining a broker's license can be a challenging and expensive procedure. Is BTFA assisting NBR on broker reforms? Do you believe that such reforms are needed? If yes, how do you believe these reforms will impact international trade and how will NBR demonstrate to the brokers' community that it is committed to these reforms? (EQ 1,2,4)

Customs Intelligence

37. What is the status of implementing intelligence practices? Has BTFA provided you training materials and or training in Intelligence practices? (EQ 1,2,4)

Domestic Transit

38. Has BTFA provided training in Domestic Transit for trade facilitation? If yes, how has this assistance impacted NBR/Customs' functions? (EQ 1,2,4)

Customs-Business Partnerships

39. What activities is NBR undertaking to promote Customs –Business Partnerships? What kind of assistance and support has BTFA provided in this regard? (EQ 1,2,4)

BTFA's Technical Assistance to NBR

40. How effective has BTFA's technical assistance to NBR/Customs been in enhancing in improving the quality of outputs (strategy, policy, operational plans, website, etc.)? (EQ 1,2,4)
41. Do you see areas of improvement for BTFA to provide more effective and/or efficient technical assistance? If yes, please explain. (EQ 1,4)
42. Are there areas where the efficiency of resource use could be improved, or conversely, priority areas, which appear under resourced? (EQ 1,2,4)
43. Is there a pool of trained staff that can continue to manage independently the website? The Enquiry Point? Risk management? Post Clearance Audit? Passenger Pre-Processing? (EQ 1,2,4)
44. On a scale of 1-5 (1 being the lowest), how efficiently did BTFA provide its technical assistance? (EQ 1,2,4)
45. On a scale of 1-5 (1 being the lowest), how effectively did BTFA provide its technical assistance? (EQ 1,2,4)
46. On a scale of 1-5 (1 being the lowest), how effectively can NBR/Customs trained staff continue to manage independently on sustaining the new capabilities implemented with technical assistance from BTFA? (EQ 1,2,4)

47. On a scale of 1-5 (1 being the lowest), how important or helpful has been BTFA's technical assistance improving NBR's functions?
48. What future trade-related interventions would you like to see at NBR to reduce your trading costs and time and to increase your volume of trade? (i.e., current activities requiring additional support and/or new activities not part of BTFA's SOW) would be necessary or very helpful to achieve the overarching objective of greater economic growth through increased trade? (EQ 1,3,5)

ANNEX 2, PART 2: QUESTIONNAIRE FOR GOVERNMENT OFFICIALS

Customs Field Offices and Port Authority

1. Do you have a risk management system in place for dealing with high risk, medium risk and low risk cargo to give them differential treatment? Does the system use profiling techniques of cargoes/traders for proper risk management? (EQ 1,2,4)
2. Has BTFA provided training in risk management? How effective is your risk management program? Do you see areas for improvement? How effective and efficient has been BTFA's training and support in this area? (EQ 1,2,4)
3. If a risk management system has been implemented, what has been the impact to NBR in terms of revenue? Processing time? Costs to customs? (EQ 1,2,4)
4. What do you see as the hindrances/challenges to trade and what are some of the solutions? (EQ 2,4,5)
5. Is your staff trained in customs procedures? If no, what areas of training would help improve your staffs' knowledge? Where do you see the greatest strengths and greater weaknesses in your staff's capability in customs procedures? (EQ 1,2,4)
6. How do you think BTFA's training and technical assistance will impact your work? (EQ 1,2,4)
7. What activities is NBR undertaking to promote Customs – Business Partnerships? What kind of assistance and support has BTFA provided in this regard? (EQ 2,4)
8. What is the status of implementing intelligence practices? Has BTFA provided you training materials and or training in intelligence practices? How do you think this will assist you in processing cargo? What effect do you think this will have on trading costs? Time? Volume of trade? (EQ 1,2,4)

ANNEX 2, PART 3: QUESTIONNAIRE FOR PRIVATE SECTOR BENEFICIARIES – INDIVIDUAL, SMALL, MEDIUM, AND LARGE BUSINESSES AND CHAMBERS OF COMMERCE

1. Have you heard of the Bangladesh Trade Facilitation Activity Project? If yes, what have you heard? (EQ 1,4)
2. Have you seen improvements in NBR's customs procedures during the past three years? If yes, what improvements have you seen? If yes, has it resulted in increasing your trade volume? If no, what steps can NBR take that would enable you to increase your trade volume and facilitate your trading? (EQ 1,2, 3,4)

Enhanced Customs Website

3. Are you aware of the Enhanced Customs Website? How did you hear about it? (EQ 1,2,4)
4. Does the website allow easy access to regularly updated customs and trade information for you to efficiently and effectively conduct your business? If yes, how has this impacted your business and trading activities? If no, what would be your recommendations for improvement? (EQ 1,2,4)
5. Does the website provide transparent information? If no, what are your recommendations to improve transparency? If yes, has this had a positive, negative or neutral impact on your trade flows/volume? If positive, to what degree? If no, to what do you attribute the lack of impact? (EQ 1,2,4)
6. Do you believe the website is useful and do you think that access to updated information will reduce the costs of doing business? Reduce time? Increase your volume of trade? (EQ 1,2,3)

Auction Procedures

7. Have you ever participated in a customs auction? (EQ 1,2)
8. NBR is planning auction procedures reform and to make online bidding a reality. What is your opinion of this activity? (EQ 1,2,4)

National Enquiry Point

9. Are you aware of the National Enquiry Point that is available on NBR website? Do you know its purpose? If yes, will you use it? If yes, how do you expect it to impact trade? (EQ 1,2)
10. Are you aware of FAQs on NBR's website? If yes, how helpful are the FAQs? (EQ 1,2)

Advance Rulings

11. Are you aware of Advance Rulings? What does it mean to you? Have you used it? If yes, are you satisfied with the process? (EQ 1,2,4)
12. How do you think advanced rulings will impact your business? Do you expect that it will decrease the cost of doing business? How do you think advanced rulings will impact your volume of trade? (EQ 1,2,3)
13. Do you know if the customs port and land border offices are trained in implementing advanced rulings? (EQ 1,2,4)
14. Do you expect that this NBR service will increase, decrease, or have no impact on your future volume of trade? (EQ 1,3)

Authorized Economic Operator Program

15. NBR is implementing the Authorized Economic Operator Program. Are you familiar with this? If so, how did you hear about it? Will you participate in it? (EQ 1,2,4)
16. Do you believe that the Program will reduce your trading time and costs? If yes, will this likely increase your volume of trade? (EQ 2,3,4)
17. Has BTFA provided training on AEO compliance? What impact do you think the AEO program will have on trade volume, costs and time? (EQ 1,2,4)

Pre-Arrival Processing

18. Are you aware that NBR is planning reforms in Pre-Arrival Processing (PAP) of Import Declarations? (EQ 1,2,4)
19. Do you believe that PAP implementation will reduce the costs and time of your business? If yes, do you believe that this will result in increasing your volume of trade? (EQ 2,3)

Post-Clearance Audit

20. Have you heard of Post-Clearance Audit? If yes, what impact do you think it will have on your costs of doing business? (EQ 1,2,4)
21. Has BTFA provided technical assistance and training on PCA's? (EQ 1,2)
22. Do you believe that customs officers will be able to efficiently and effectively implement PCA? (EQ 2,4)

Risk Management

23. Do you think that customs staff is trained to manage risk management well? (EQ 1,2,4)

24. How has customs risk management impacted your trading? (EQ 1,2,4)

25. What changes, if any, would you like to see in customs risk management? (EQ 2,4)

ANNEX 2, PART 4: QUESTIONNAIRE FOR USAID

1. What is your view with regards to BTFA's progress in reaching its outputs and objectives? (EQ 1,2)
2. What is your perception regarding areas where the GOB has accepted reforms that they are likely to sustain after BTFA closes? What areas do you believe the GOB will likely not be able to sustain? (EQ 1,2)
3. Do you perceive that BTFA has responded appropriately to challenges it has encountered and are there areas they could have done better? (EQ 1,2)
4. What is your opinion with regards to areas for future additional support? (EQ 2,4,5)
5. We believe that the culture of passing the decision up the chain of command slows trade. What is your preliminary reaction to the suggestion of possible realignment in the decision making/decentralization regime within NBR vis-à-vis its field offices, to improve the situation on this count? (EQ 2,4,5)
6. We understand that the BTFA project has not had its data verified as other projects have had. When we work on this issue, shall we concentrate on the verification of process for the policy indicator? (EQ 1,2)
7. What improvements would you like to see in the project? (EQ 1,2,5)
8. Since the GOB's institutional policies and practices (based on current law) require regular rotation of civil servants and this policy is unlikely to change in the foreseeable future, do you think that training new customs officers at a private training institute or in a university setting might be a solution to the challenge of having customs officials who are not properly trained and therefore cannot properly execute their jobs? (EQ 1,2,4)

ANNEX 2, PART 5: QUESTIONNAIRE FOR SHIPPING COMPANIES, INCLUDING EXPEDITED COURIER SHIPPERS AND CUSTOMS BROKERS

1. What are the challenges, if any, in obtaining a broker's license? What corrective steps, if any, would you like to see to facilitate the process? (EQ 1,2,4)
2. Are you aware that NBR is planning reforms in obtaining brokers' licenses? Do you believe that the process is weighted against small business and individuals? (EQ 1,2)
3. Has BTFA provided support/training in 'expedited shipment/courier service procedures? Has this program been implemented? If yes, is it operational? (EQ 1,2,4)
4. What are the challenges facing the expedited shipment/courier service industry? How would an implemented pre-clearance, risk management, post clearance system in place impact your volume of trade? Costs? Time? (EQ 1,2,3)

Women's Associations

5. Are you aware of BTFA's activities? (EQ 1,2)
6. Have you participated in BTFA's events and activities? If so, what impact did BTFA's assistance have on your business or business opportunities? (EQ 1,2)
7. Do you have any suggestions for other activities or areas of focus where BTFA can assist women in business? (EQ 2,5)

Donors, NGOs and other Entities

8. Are you aware of BTFA? (EQ 1,2)
9. Do you coordinate your technical assistance to NBR/Customs with BTFA? If yes, are you satisfied with your coordinated efforts? If no, would you be interested in coordination? If not, why not? (EQ 2,4)
10. How do you perceive your activities and technical assistance to NBR/Customs to interact with those of the BTFA? (EQ 2,4)

ANNEX 2, PART 6: SELF-ASSESSMENT QUESTIONNAIRE – BTFA STAFF

(You are welcome to provide input directly into this document, or use another document.)

QUESTION 1. The Evaluation Team has used the overall performance indicators as evidence that BTFA has or has not achieved its desired results to date. Please provide any comment with regards to our assessment.

PART A. Has the project provided improved availability and transparency of trade-related information for the private sector? Has the information been well utilized by the private sector? How is NBR's Enhanced Beta Version of the Bangladesh Customs web site a substantial improvement over the existing Jessore Customs web site?
(<http://www.jessorecustoms.gov.bd/>)

PART B. Have there been tangible improvements in efficiency (i.e., reduced time and cost) of trade-related processes from the results of the project so far? What are those improvements? Is there likely to be improvements in reduced time and cost of trading before the end of the project? If there have been efficiencies, with which custom procedures are they related?

PART C. What course corrections would you like to see implemented in the remaining life of the project?

PART D. What key strategic and programmatic options do you recommend for future trade-related engagements in Bangladesh?

PART E. Regarding the design and implementation of each of the technology components of the project (i.e., Customs web site, risk analysis/intelligence system, case management system, auction system), please comment on:

- a. How robust is the technology?
- b. Is there an appropriate plan in place to continue with the information technology after project closure?
- c. Is there a plan to update the content?
- d. Is there a commitment in place at NBR for continuation?

QUESTION 2. How effectively has BTFA developed a sense of ownership by the GOB of the reforms and improvements in trade-related processes?

QUESTION 3. To what extent will the outcome of BTFA interventions likely result in increased trade volumes?

QUESTION 4. What challenges has BTFA faced in implementing its activities and how has BTFA responded to those challenges? Are there any recommended alternatives to these approaches?

QUESTION 5. What future trade-related interventions (i.e., current BTFA activities requiring additional support and/or new activities not part of BTFA's SOW) would be necessary or very helpful to achieve the overarching objective of greater economic growth through increased trade?

ANNEX 3: LIST OF INTERVIEWEES

SI No	Date	Name of Participant	Designation	Organization	Sex (M/F)
1	8-May	John P Macy	COR / BTFA	USAID	M
2	9-May	Glenn F.J. Mackenzie Frazer	Chief of Party	BTFA	M
3	9-May	Mohammad Al Said	SCSTL	BTFA	M
4	9-May	Mahmuda Khandker	Sr. M & E Specialist	BTFA	F
5	9-May	Mark Hamill	INTEL TL	BTFA	M
6	9-May	Andrew Allan	T.L. Trade Facilitation	BTFA	M
7	9-May	Dr. Khairuzzaman Mozumder	Deputy Chief of Party	BTFA	M
8	9-May	Md. Rezwanur Rahman	ICT Expert	BTFA	M
9	9-May	Md. Nasir Uddin	Senior Customs and Trade Facilitation Specialist	BTFA	M
10	9-May	Dr. Mohammad Abu Yusuf	Custom Specialist	BTFA	M
11	11-May	John P Macy	Private Enterprise Officer, Economic Growth Office	USAID	M
12	11-May	Md. Asad Kibria	Gateway Manager, DHL	DHL	M
13	11-May	Desmond Quiah	Country Manager, DHL	DHL	M
14	11-May	Zulfiqar Ali Siddique	Director-Operations, DHL	DHL	M
15	11-May	AZM Zahidul Islam	DGM- Operations & TSG, UPS	UPS	M
16	11-May	Ahmed Jahid	Head of Business, UPS	UPS	M
17	11-May	Bashir A.K. Chowdhury	Executive Director, FedEx	FedEx	M
18	13-May	MD. EmdadulHaque (lata)	C&F Agent Jessore	Broker	M
19	14-May	Md. Shawkat Hossain	Commissioner, Customs Office, Benapole	Benapole Customs	M
20	14-May	Md. Zakir Hossain	Joint Commissioner, Customs Office, Benapole	Benapole Customs	M
21	14-May	Nitish Biswas	Deputy Commissioner, Customs Office, Benapole	Benapole Customs	M

22	14-May	Amimul Ehsan Khan	Joint Commissioner, Customs Office, Benapole	Benapole Customs	M
23	14-May	Md. Nurul Basir	Asst. Commissioner, Customs Office, Benapole	Benapole Customs	M
24	14-May	Marufur Rahman Khan	Deputy Commissioner, Customs Office, Benapole	Benapole Customs	M
25	14-May	Esmay Azam	ARO	Wire house, Benapole	M
26	14-May	Md. Anisuzzaman Khan	Quarantine Pathologist	Dept. of Agricultural Extension, Ministry of Agriculture,	M
27	14-May	Md. Aminul Islam	Deputy Director Traffic, Benapole Land port	Benapole Port	M
28	14-May	Md. Reazul Karim	Deputy Director (Admin), Benapole Land port	Benapole Port	M
29	15-May	Md. Amirul Islam	Asst. Revenue Officer,	Benapole Customs	M
30	15-May	Shah Alam Miah	Asst. Revenue Officer	Benapole Customs	M
31	15-May	G.M. Nasir Uddin	Asst. Revenue Officer	Benapole Customs	M
32	15-May	Nasir Uddin	Asst. Revenue Officer	Benapole Customs	M
33	15-May	Md. Nurul Basir	Asst. Commissioner	Benapole Customs	M
34	15-May	Md. Mofizur Rahman	President, C&F Agent, Benapole	Broker	M
35	15-May	Nuruzzaman	S. V. President, C&F Agent, Benapole	Broker	M
36	15-May	Khairuzzaman	V. President, C&F Agent, Benapole	Broker	M
37	15-May	Mohsin Milon	Joint Secretary, C&F Agent, Benapole	Broker	M
38	15-May	Alamgir Siddique	Joint Custom Secretary	Broker	M
39	15-May	Md. Shahabuddin	Asst. Finance Secretary	Broker	M
40	15-May	Md. Moznur Rahman	Cultural and Sport Secretary	Broker	M

41	15-May	Md. Abdar Rahman	Executive Member, C&F Agent, Benapole	Broker	M
42	15-May	Md. Nasir Uddin	Customs Affair Secretary, C&F Agent, Benapole	Broker	M
43	15-May	Md. Abdul Latif	Executive Member, C&F Agent, Benapole	Broker	M
44	15-May	Md. Shahabuddin	Port Secretary, Executive Member, C&F Agent, Benapole	Broker	M
45	15-May	Md. Rabiul Islam	Proprietor of National Trading Co. ,C&F Agent, Benapole	Broker	M
46	15-May	Shamsur Rahman	C&F Agent, Benapole	Broker	M
47	15-May	Md. Shayekh Arefin Zaheli	Asst. Commissioner, Customs House	Dorshona Customs	M
48	15-May	Mrs. Farida Yasmin	Revenue Officer, Customs House, Dorshona	Dorshona Customs	F
48	15-May	Monirul Islam	Asst. Revenue Officer, Customs House, Dorshona	Dorshona Customs	M
50	15-May	Md. Al-Amin Deputy	Commissioner, Customs House, Dorshona	Dorshona Customs	M
51	15-May	Syed Mukaddis Hossain	Asst. Commissioner, Customs Office, Dorshona	Dorshona Customs	M
52	15-May	Jamal Hossain	Customs Commissioner, Dorshona	Dorshona Customs	M
53	16-May	Md. Abdul Quayum	Asst. Commissioner	Bhomra Customs	M
54	16-May	Mr. Mondol	Asst. Commissioner	Indian Custom	M
55	16-May	Md. Ziaul Islam	Deputy Director, Quarantine	Dept. of Agricultural Extension, Ministry of Agriculture	M
56	16-May	Mr. Abdul Jalil	Deputy Director	Bangladesh Land Port Authority	M
57	16-May	Quazi Naushaddiun	President	C&F Association	M
58	16-May	G.M. Amir Humza	Importer	Maa Traders	M
59	16-May	Momtaz Ahmed Bapi	C&F Agent	Broker	M

60	16-May	Dipankar Ghosh	Importer	Sundarban Enterprise	M
61	16-May	Mostafizur Rahman	C&F Agent	Broker	M
62	17-May	Margoob Ahmed	Customs Commissioner	Khulna Customs	M
63	17-May	Abdul Mannan Shikder	VAT Commissioner	Khulna Customs	M
64	17-May	Kanu Kumar Mitra	Revenue Officer	Mongla Customs	M
65	17-May	Md. Neamul Hasan	Asst. Commissioner	Mongla Customs	M
66	17-May	Mohammad Anamul Huq	Joint Commissioner	Mongla Customs	M
67	17-May	S.M. Kabiruzzaman	MD., Labonno Pvt. Ltd.	Broker	M
68	17-May	Md. Kabir Ahmed	Information Secretary,	Mongla C & F Association	M
69	17-May	Md. Shrowar Hossain	Member C&F Association	Broker	M
70	17-May	Md. Mominul Islam	Proprietor, Seagull Shipping	Broker	M
71	17-May	Md. Nazrul Islam	Noorjahan Shipping Agency	Broker	M
72	17-May	Mostafa Bhutto CEO	Joycee Shipping Agency	Broker	M
73	17-May	SK. Liakat Hossain	Organizing Secretary	Mongla C & F Association	M
74	17-May	Shamsul Alam	Vice President	Mongla C & F Association	M
75	17-May	Zillur Rahman	Sr. Vice President	Mongla C & F Association	M
76	17-May	Mahmud Ahsan Tito	General Secretary	Mongla C & F Association	M
77	17-May	Sultan Hossain Khan	President	Mongla C & F Association	M
78	18-May	Md. Faridujjaman	Quarantine Pathologist	Dept. of Agricultural Extension, Ministry of Agriculture	M
79	18-May	Md. Mahbubur Rahman	Assistant Commissioner	Khulna Customs	M

80	18-May	Md. AbulKalam Azad	Assistant Commissioner	Khulna Customs	M
81	18-May	Md. Mamun or Rashed	Sub Assistant Quarantine officer	Dept. of Agricultural Extension, Ministry of Agriculture	M
82	18-May	Md. Mostafa Kamal	Director Traffic	Mongla port authority	M
83	18-May	Mirza Md. Zohurul Haque	Asst. Manager (Admin)	Kotobuki	M
84	18-May	Tazbirul Azhar		Kotobuki	M
85	18-May	Mofidul Islam	Director	Khulna Chamber of Commerce and Industry	M
86	18-May	Sharwar Abedin	Khulna Chamber	Khulna Chamber of Commerce and Industry	M
87	18-May	N.S. Guha Roy	FC Member	Bangladesh Shipping Agents' Association	M
88	18-May	Capt. Rafiqul Islam	Chairman BSAA	Bangladesh Shipping Agents' Association	M
89	18-May	Mustofajaysan Bhutto	Vice President	Khulna Chamber of Commerce and Industry	M
90	21-May	Mr. Mostafa Azad Chowdhury Babu	President, Bangladesh Chamber of Industries	Bangladesh Chamber of Industries	M
91	21-May	Mr. Manzur Ahmed	Advisor, Federation of Bangladesh Chambers of Commerce & Industry (FBCCI)	Federation of Bangladesh Chambers of Commerce and Industries	M
92	21-May	Mr. Nazmul Haque	Director, Bangladesh Chamber of Industries	Bangladesh Chamber of Industries	M

93	21-May	Mr. K. M. H. Shahidul Haque	President and CEO, The Savior Chairman, Standing Committee for Import, FBCCI;	Federation of Bangladesh Chambers of Commerce and Industries	M
94	21-May	Mr. Abul Kalam Bhuiyan	Managing Director and CEO, Eastern Meter And Director, Bangladesh Chamber of Industries	Bangladesh Chamber of Industries	M
95	21-May	Mr. Shahidul Islam Niru	Former Director, Bangladesh Chamber of Industries	Bangladesh Chamber of Industries	M
96	21-May	Mr. Shahid Alam	Director	Genivo Pharma	M
97	21-May	Md. Mosharaf Hossain	Consultant	BTFA	M
98	21-May	Dr. Khairuzzaman Mozumder	Deputy Chief of Party	BTFA	M
99	21-May	Md. Rezwannur Rahman	ICT Expert	BTFA	M
100	22-May	Prokash Dewan	Custom Commissioner	Dhaka Customs	M
101	22-May	Shamim Ara Begum	Joint commissioner	Dhaka Customs	F
102	22-May	Md. Al Amin	Assistant. Commissioner	Dhaka Customs	M
103	22-May	Kazi Rahinul Jaman	Assistant. Commissioner	Dhaka Customs	M
104	22-May	Md. Zahidur Rahman	Systems Analyst	Dhaka Customs	M
105	22-May	Ms. Lori Rakoczy	AMEG Representative	USAID	F
106	22-May	Mr. Ali Ahamed	CEO	Bangladesh Foreign Trade Institute	M
107	22-May	Harunr Rashid	Chairman	Global Pharma	M
108	22-May	Abdul Muktedir	Chairman	Incepta	M
109	22-May	SM Shafiuzzaman	MD, Labonno Pvt. Ltd.	Hudson	M
110	22-May	MD Halimuzzaman	CEO	Healthcare Pharma	M
111	23-May	ATM Abdullah Khan	Commissioner	Customs House, Chittagong	M

112	23-May	Md. Raichuddin	Joint Commissioner	Customs House, Chittagong	M
113	23-May	Md. Hasnat Ali	Joint Commissioner	Customs House, Chittagong	M
114	23-May	Dr. Showkat Ali Saadi	Additional Commissioner	Customs House, Chittagong	M
115	23-May	Md. Ghyes Kamal	Joint Commissioner	Customs House, Chittagong	M
116	23-May	Chapal Chakma	Deputy Commissioner	Customs House, Chittagong	M
117	23-May	Kazal Nandy	Assistant Revenue Officer	Customs House, Chittagong	M
118	23-May	Shariful Islam	Revenue Officer	Customs House, Chittagong	M
119	23-May	Jabunnasa	Assistant Commissioner	Customs House, Chittagong	F
120	23-May	Nasrin Akter Eti	Assistant Commissioner	Customs House, Chittagong	F
121	23-May	Md. Ahsan ullah	Assistant Commissioner	Customs House, Chittagong	M
122	23-May	Sinigdha Biswas	Deputy Commissioner	Customs House, Chittagong	F
123	23-May	Md. Shakil Khondoker	Deputy Commissioner	Customs House, Chittagong	M
124	23-May	Md. Khairul Alam	Deputy Commissioner	Customs House, Chittagong	M

125	23-May	Bellal Hossain	Assistant Commissioner	Customs House, Chittagong	M
126	23-May	Md. Ariful Islam	Deputy Commissioner	Customs House, Chittagong	M
127	23-May	Md. Abul Kasam	Assistant Commissioner	Customs House, Chittagong	M
128	23-May	ANM Zahid Hasan	Sr. Programmer	Customs House, Chittagong	M
129	23-May	Madhab Bikash Dev Rai	Assistant Commissioner	Mega Port, CTG	M
130	23-May	Sinigdha Biswas			
131	23-May	Jebunnasa			
132	23-May	Nasrin Akter Eti			
133	23-May	Surash Chandra Biswas	Additional Commissioner	Chittagong VAT	M
134	23-May	Md. Mizanur Rahman	Deputy Commissioner	Chittagong VAT	M
135	23-May	Md. Salauddin Rizvi	Deputy Commissioner	Customs Bond	M
136	23-May	M. Sofiuzzaman	Additional Commissioner	Chittagong VAT	M
137	23-May	M. Enamul Hoque	Commissioner	Appeal Com	M
138	23-May	Syed Golam Kibria	Commissioner	Customs Excise & VAT	M
139	24-May	Syedul Mostafa Chy	1st Vice President	C&F Association	M
140	24-May	IMM Rofiqul Islam	2nd Vice President	C&F Association	M
141	24-May	Obaidul Alam	Custom Sec	C&F Association	M
142	24-May	Md. Alauddin Al Azad	Assistant Finance Secretary	C&F Association	M
143	24-May	Md Liakat Ali Hawlader	Port Secretary	C&F Association	M

144	24-May	Ashraful Haque Khan	Joint Custom. Secretary	C&F Association	M
145	24-May	Md. Abdul Hai Masum	Executive Member	C&F Association	M
146	24-May	Md. Abul Khair	1st Joint Custom. Secretary	C&F Association	M
147	24-May	Md. Hasinuddin Alam Rumi	Office Secretary	C&F Association	M
148	24-May	Michchu Saha	3rd Vice President	C&F Association	M
149	24-May	Md. Saifuddin Siddique	Member C&F Association	C&F Association	M
150	24-May	Md. Joynul Abedin	Law Secretary	C&F Association	M
151	24-May	Debasis Chowdhury	Asst. Secretary	C&F Association	M
152	24-May	Shajedul Kasim	CDR BN	Navy	M
153	24-May	Momruzzaman	SSA BN	Navy	M
154	24-May	Md. Amdadul Haque	Navy Rep.	Navy	M
155	24-May	Md. Ashraf Kwrim Chy	Assistant Terminal Manager	Port Authority	M
156	24-May	Dr. md. Rakibul Islam	Thana Live Stock Officer	Dept. of Live Stock	M
157	25-May	AKM Mahbubur Rahman	Additional D.G	Customs Training	M
158	25-May	Abu Hanif Mohammed Abdul Ahad	Assistant Director	Customs Training	M
159	25-May	M. Nasiruddin	Chairman & MD	Pacific Jeans	M
160	25-May	M N Huda	Group GM	Pacific Jeans	M
161	27- May	Ms. Naaz Farhana Ahmed	President	Dhaka Women Chamber of Commerce and Industry	F
162	28-May	Md. Saiful Hasib	DG	Bangladesh Standards and Testing Institution	M
163	28-May	S.H. Ishraque Ali	Director	Bangladesh Standards and	M

				Testing Institution	
164	28-May	Md. Nozir Ahmmod	Asst. Director	Bangladesh Standards and Testing Institution	M
165	28-May	Md. Mohsin	Director	Dept. of Agricultural Extension, Plant Quarantine Wing, Ministry of Agriculture	M
166	28-May	Kbd. Md. Abu Sadeque	Deputy Director (Import)	Dept. of Agricultural Extension, Plant Quarantine Wing, Ministry of Agriculture	M
167	28-May	Md. Azhar Ali, PhD	Additional Director	Dept. of Agricultural Extension, Plant Quarantine Wing, Ministry of Agriculture	M
168	28-May	Subrata Kumar Das	Quarantine Entomologist	Dept. of Agricultural Extension, Plant Quarantine Wing, Ministry of Agriculture	M
169	28-May	Md. Anwar Hossain Khan	Deputy Director (Export)	Dept. of Agricultural Extension, Plant Quarantine Wing, Ministry of Agriculture	M
170	29-May	Md. Tanveer Islam	GM	PRAN-RFL Group	M

171	30-May	Md. Munir Hossain	Director	Bangladesh Garment Manufacturers and Exporters Association	M
172	05-June	Ramesh Siva	Lead E-Government Specialist	World Bank Group	M
173	05-June	Nusrat Nahid Babi	Operations Analyst	World Bank Group	F
174	07-June	Md. Lutfor Rahman	Member, Customs Policy	National Board of Revenue	M
175	07-June	M. Fakhru Alam	1 st Secretary, Customs Policy	National Board of Revenue	M
176	07-June	Md. Abdul Hakim	1 st Secretary, Customs Modernization	National Board of Revenue	M
177	07-June	Mohammad Shafiqur Rahman	Systems Manager	National Board of Revenue	M
178	07-June	Md. Reyadul Islam	2 nd Secretary, Customs Policy	National Board of Revenue	M

ANNEX 4: TECHNICAL ASPECTS OF BTFA ACTIVITIES

CUSTOMS WEBSITE

Functionalities for Visitors – the Front End (www.bangladeshcustoms.gov.bd)

- The content is available in English and Bangla versions. Some content is still missing in the Bangla version.⁴³ The appearance is different from other government websites insofar that most of Bangladesh’s government websites follow a similar template/design which is provided by the Prime Minister’s office.
- The duty calculator is a useful tool. It calculates the applicable duties based on HS (Harmonized System) Code or key word along with other taxes and provides a total tax incidence (TTI). The calculator base information is updated from the previous year’s national budget.
- The site also calculates the duty for preferential tariff goods—for trade with SAFTA (South Asian Free Trade Area) and APTA (Asia Pacific Trade Agreement).
- During the period of the evaluation, it was determined that the search option should have more options to filter the results when one is searching the Customs orders published by the National Board of Revenue of the Government of Bangladesh since 1971.⁴⁴
- As of 29 May, when the team tested the website, there were many pages (e.g., ‘contact us page’), stating that the website is under construction or “page not found.” NOTE: USAID subsequently advised that Bangladesh Customs Website was in the process of transferring from ‘Beta’ to ‘Live’ version at that point, which accounts for some of the issues mentioned here. USAID further advised that these options are now available in the live version.
- There is no confirmation on the website for query submitted or feedback or comment submission.
- There is a visible ‘login’ option, but it is not operational at this time.⁴⁵ This should be hidden as it may confuse users trying to log in. This option should only become visible when the option is operational, then it should be visible.
- As of May 29, The A-Z topic list on the top right side did not work in the Bangla version.
- There are several other local customs websites, e.g., Dhaka, Jessore, which contain information on SROs, trade procedures, licensing procedures and forms. The trade portal at Ministry of Commerce also contains some similar information.

Back End of Website

The back end looks very simple and lacks advanced functionalities including no advance editor for page content modification, media folder management etc., no options for Search Engine Optimization (SEO) or home page sliding banner setting. It can create pages and has a navigation menu. It has only one user setup for back end access which will be shared with the NBR website team. In addition:

- For all types of duty, the tariff entry has to be done manually using a MySQL database, which is a difficult job even for the developers to update. We recommend creating a user-friendly form for this data update purpose.

⁴³ Missing Bangla content versions include: Duty Calculator, Events, All Docs, SO, SRO.

⁴⁴ As of October 30, 2017 the website had added Google search engine

⁴⁵ BTFA has stated that this function was kept in the website due to NBR’s insistence. NBR wants to keep this option for future administrative purposes (October 2017).

- The back end update of the duty calculator is not user-friendly. It has to be updated by a technical process, which manages data in a comma separated value (CSV) upload. BTFA could develop an uploading form to help the process.
- The rate update mechanism for preferential tariff goods is manual from the back end.
- The universal resource locators (URLs) are search engine friendly, which is a positive attribute. This provides a degree of security *i.e.*, hiding the database skeleton thus providing a security feature helping to prevent a Structure Query Language (SQL) injection attack.
- There is no contact form in the website.
- There is no 'CAPTCHA' used for the website feedback form submission which makes it more 'hackable.'
- During the period of the evaluation, the website was in the process of transferring from "beta" to "live". It looked like a mobile-friendly responsive website, but some pages create layout problems in mobile browsers. Thus, it was not 100 percent mobile-friendly. BTFA subsequently said this problem no longer exists in the "live" version

Hosting of Website

The new Customs website will be hosted by the Bangladesh Computer Council (BCC). BCC provides security measurements and backups. This option, used for other government websites, makes NBR fully dependent on BCC to recover from any incidents.

BCC Hosting Services are provided in both Linux and Windows environment with database support of MS SQL Server, Oracle, IBM DB2 and MySQL. Backup of data is done on a weekly basis for the hosting services provided and maintained by National Data Center. To protect hosting applications and websites, BCC recently deployed Web Application Firewall (WAF). The National Data Center provides 24X7 supports to its client through online helpdesk, email, and phone depending on the Service Level Agreement (SLA). The objective of the National Data Center of Bangladesh Computer Council (BCC) is to provide state-of-the-art services to its valued client.

Sustainability

BTFA reports that they assisted NBR in forming a management team along with a management plan to make the website sustainable. In addition, there are separate teams for website content update and the technical aspect. It is probable that three BTFA staff will return to NBR, thus inserting into NBR a vested interest in continuation of the website and NEP.

Website conclusion

Local custom websites should be linked to the national customs website. Some information is local and local custom websites provide local information. Also the national trade portal at the Ministry of Commerce should be linked with the website. Overall it's a good informative website for the traders.

Recommendations

- BTFA could develop an uploading form to help the process.
- The inoperable 'login' option should be hidden until operational.
- Customs, in addition to hosting organization's (Bangladesh Computer Council, BCC) backup, should have its own backup system.

- There are small issues in Opera and Safari latest browser - sometimes the page appears to be broken in Safari for the delay loading of style-sheets, also the navigation menu appears differently in Safari, which should be improved for a better visitor experience.



Fig I. showing virtual user (VU) and average load time, during load testing using loadimpact.com

www.bangladeshcustoms.gov.bd/_/HomePage_B...	File: Aho, US (Amazon) Auto generated from www.bangladeshcusto...	Get	200 OK	113	10.31 KB	460.34ms 936.86ms	593.67ms
www.bangladeshcustoms.gov.bd/_/loading.pdf	File: Aho, US (Amazon) Auto generated from www.bangladeshcusto...	Get	404 Not found	107	310 Bytes	450.99ms 1.5%	520.08ms
www.bangladeshcustoms.gov.bd/_/ntr_chair...	File: Aho, US (Amazon) Auto generated from www.bangladeshcusto...	Get	200 OK	108	105.23 KB	1154 1.6%	1.2%
www.bangladeshcustoms.gov.bd/_/NBR-cust...	File: Aho, US (Amazon) Auto generated from www.bangladeshcusto...	Get	200 OK	114	16.03 KB	489.92ms 1.82%	778.22ms
www.bangladeshcustoms.gov.bd/_/NRP.png	File: Aho, US (Amazon) Auto generated from www.bangladeshcusto...	Get	200 OK	109	6.59 KB	460.21ms 1.02%	693.08ms
www.bangladeshcustoms.gov.bd/_/Photo.jpg	File: Aho, US (Amazon) Auto generated from www.bangladeshcusto...	Get	200 OK	113	6.31 KB	460.64ms 848.85ms	585.39ms
www.bangladeshcustoms.gov.bd/_/vstc_mim...	File: Aho, US (Amazon) Auto generated from www.bangladeshcusto...	Get	200 OK	113	6.84 KB	460.23ms 1.5%	517.92ms
www.bangladeshcustoms.gov.bd/_/USAID-Ins...	File: Aho, US (Amazon) Auto generated from www.bangladeshcusto...	Get	200 OK	111	54.8 KB	919.64ms 2.1%	1.04%
www.bangladeshcustoms.gov.bd/_/ntrnmen...	File: Aho, US (Amazon) Auto generated from www.bangladeshcusto...	Get	404 Not found	109	1.75 KB	461.36ms 817.78ms	509.8ms
www.bangladeshcustoms.gov.bd/_/ntrndvst...	File: Aho, US (Amazon) Auto generated from www.bangladeshcusto...	Get	200 OK	106	698 Bytes	460.79ms 1.02%	533.1ms
www.bangladeshcustoms.gov.bd/_/Customs-It	File: Aho, US (Amazon) Auto generated from www.bangladeshcusto...	Get	404 Not found	111	1.75 KB	461.84ms 1.4%	517.11ms

Fig II. Showing three page load error using loadimpact.com

TECHNICAL ASPECTS REGARDING NEP

Front End

The NEP portal looks like a lightweight help-desk type of application. Its major functionalities include a front end,⁴⁶ enquiry form, and some common links. It is considered 'light weight' because it includes

⁴⁶ A front end to a website is that information visible to the public.

neither a visitor's registration nor a feedback section for the visitor. The website is built using PHP - MySQL, a well-known and common platform for developing websites. It is an acceptable technology. In the NEP website enquiry form there was no 'CAPTCHA mechanism', which protects the website from script spamming. This is a weakness of the query form.

Back End

User management on the 'back end' or the administrative section was developed according to NBR's request, with a limitation to three types of administrative users. It has a simple back end dashboard, *i.e.*, only the questions to be answered. There are two reports in the report section: One shows questions not answered within 72 hours, and the other shows questions not answered by assigned Customs official.

A better back end dashboard would show more detailed information on the queries: more statistical data and more reports. Elements that could be included are: the number of questions asked within a time period, the number of visitors to the site, the pending number of questions, the turnaround response time, the number of questions by category, along with graphics and other analytics. In addition, a more secure system would have the following elements.

- A browser that does not cache the user password by default. This may be a security issue in common office desktops.
- A detail load testing report after launching should be made. Otherwise hacker or huge network traffic can make the site publicly unavailable. It will also test the robustness of the hosting server.
- NEP authentication systems should have passwords, role management, session IDs (as long as they are valid), and cookies that will prevent a hacker to access the account from any computer. To avoid this situation a strong password system is strongly recommended.
- Website cookies are not encrypted. There is a logout problem in website admin.

Overall

The universal resource locators (URLs) are search engine friendly, which is a positive attribute. This provides a degree of security *i.e.*, hiding the database skeleton thus providing a security feature, *i.e.* helps prevent SQL injection attack.

During the demonstration at the development website on 21 May 2017, some functionalities were still under development, not fully functional or malfunctioning during demonstration.

NEP Process of Response to NEP Questions

Currently, it is a two-tier system by which a Supervising Customs officer reviews the question, finds it valid or invalid, and assigns it to another official to answer. BTFA indicates that they will be providing a mapping between questions and categories of responses, enabling assignment of topics to individual customs officials so an expertise is developed and time is not wasted in learning the answers by each official. Currently, the described process to the evaluation team by BTFA is that invalid questions, *i.e.*, those for which Customs has no responsibilities, are just not answered. Alternative responses might be boilerplate language that the question is not within NBR's jurisdiction or a referral to the MOC portal. (It can also be changed later on to include the NSW.)

BTFA indicated that those responsible for NEP would provide a FAQ if there are more than five requests on the topic, and that NBR would combine questions and respond to the two enquirers with the same answer if they are similar. The evaluation team found that the NEP was functional on the development server, but not on NBR/Custom's new website.

Hosting

The NEP website will be hosted in Bangladesh Computer Council (BCC), as is NBR's website. BCC provides security measurements and backups. This option, used by more than 500 other government websites, makes NBR fully dependent on BCC to recover from any incidents. The best option is that each organization has its own backup system, which is automatic, not a very costly endeavor.

Sustainability

BTFA reports that they assisted NBR in forming a management team along with a management plan to make the website and NEP sustainable. In addition, it is probable that three BTFA staff will return to NBR, thus inserting into NBR a vested interest in maintaining the application.

Findings

- NEP portal has some ambiguity among topics-officer assignments-categories.
- There are limited reports in the back end.
- There is no confirmation email after submitting a query.
- There is no status update panel for the visitors.
- A CAPTCHA mechanism is not being used on forms for protecting scripting hacking.

Recommendations

- Improve the basic security features.
- Increase number of reports with some statistical information in the dashboard.
- Automatic backup create options should be available in the portal.
- Confirmation email when query has been submitted.
- Email to inquirer if question is outside of NBR's scope of responsibilities.

Overall Findings on IT Activities (Status until 16th June 2017)

<u>IT Components</u>	<u>Task Status</u>	<u>Remarks</u>
Bangladesh customs website	Ready to be launched.	The website should be linked to the trade portal at the Ministry of Commerce.
National Enquiry Point (NEP)	Most of the work is complete; the NEP is scheduled to be launched one month after the website is operational.	The NEP will enable traders to obtain fast, reliable, and transparent information directly from Customs.
Customs Intelligence Database	The general design has been developed.	Pocket Notebook has been published.
Case Management System	The general design has been developed	

Online auction system	Chittagong plans to roll out an ASYCUDA auction module.	UNCTAD is assisting Customs House Chittagong in implementing auction module in ASYCUDA World. BTFA is planning to develop an online bidding portal.
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ANNEX 5: SCOPE OF WORK

Scope of Work (SOW) for the Bangladesh Trade Facilitation Activity (BTFA)

Project's Mid-term Performance Evaluation

PROJECT TO BE EVALUATED	
Project Name	Bangladesh Trade Facilitation Activity
Contract Number	Task Order AID-388-TO-13-00002
Original Project Date	September, 2013 – September, 2018
Original Funding	\$11,994,806
Implementing Partner	IBI International

BACKGROUND

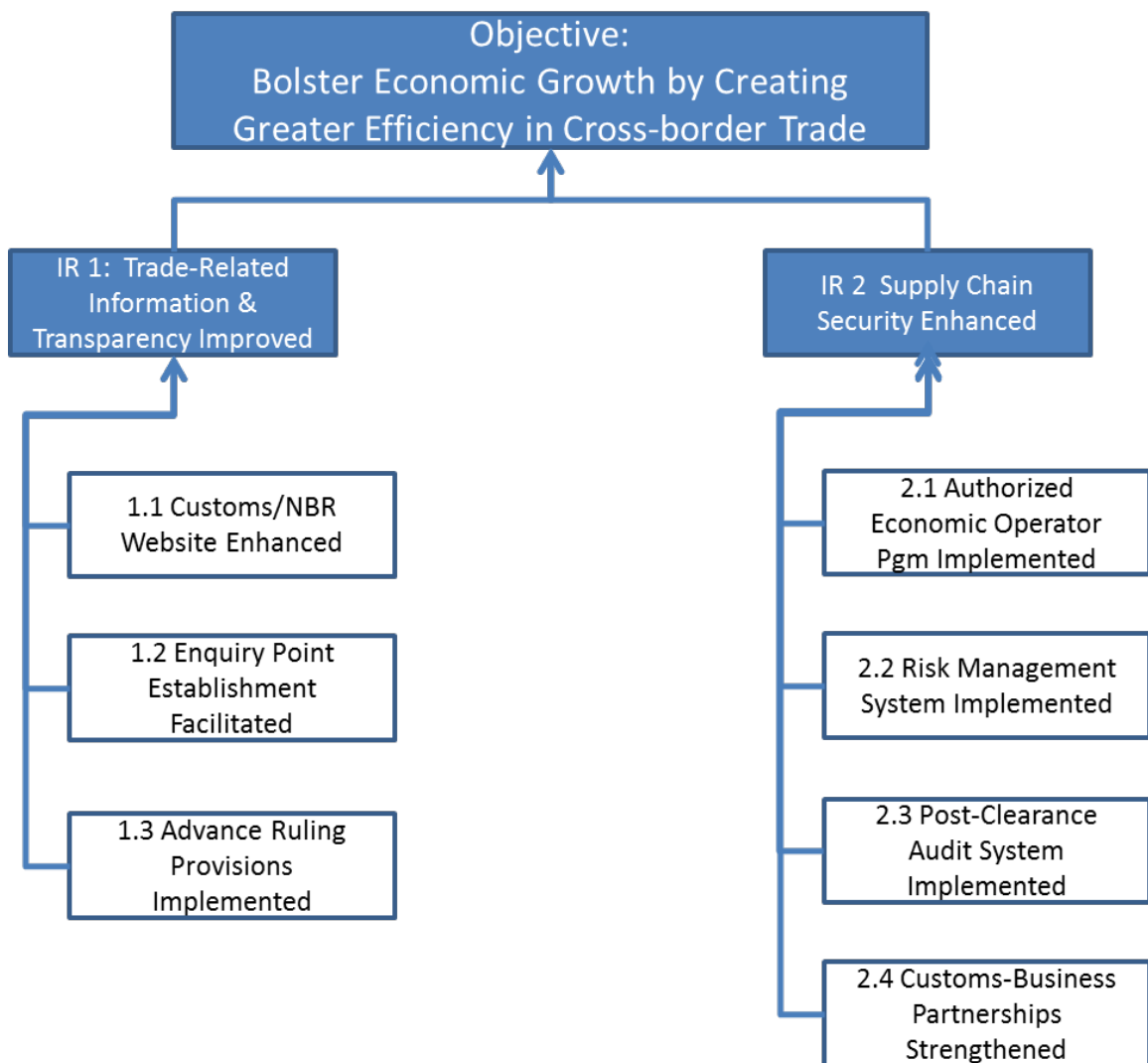
The Bangladesh Trade Facilitation Activity (BTFA) is a five-year project, which started in September, 2013 and is being implemented by IBI International, in collaboration with the National Board of Revenue (NBR) and Government of Bangladesh (GOB). This is an activity under “Development Objective (DO) 2: Food Security Improved,” of USAID/Bangladesh’s Country Development Cooperation Strategy (CDCS). DO2 is also the flagship DO for the Feed the Future (FTF) strategy and its objective in Bangladesh: “Availability, Access, and Utilization of Domestically Produced and Nutritious Foods Increased.”⁴⁷

A major component of the Bangladesh Feed the Future Strategy is to promote livelihoods and economic growth so that target populations will have greater access to food (through purchase or other means), improve family nutrition, and help pull the lowest income people out of poverty. Bangladesh trade with India, especially along the southwest border adjacent to the FTF zone of influence, is very low by regional and international standards. The BTFA is paying special attention to the impacts of trade on agriculture and food supply in the highly vulnerable Southern Delta Region. By reducing the time and cost of trade, these trade facilitation measures are designed to indirectly increase trade in agricultural commodities and increase employment in private sector firms, helping to achieve the FTF vision.

⁴⁷ USAID/Bangladesh Multi-Year Feed the Future Strategy 2010-2015.

Results Framework of BTFA Project

DO2 IR 2.2: Improved Access through Market Systems



PROJECT INTERMEDIATE RESULTS

The original BTFA task order included three Intermediate Results (IRs) as follows:

- IR 1: Trade-related Information & Transparency Enhanced
- IR 2: National Single Window Operational
- IR 3: Supply Chain Security Enhanced

However, as a result of negotiations in Year 2 between USAID and the World Bank, the World Bank assumed responsibility for the development of the National Single Window (IR 2 above). Subsequently, in March 2016, the task order with BTFA was amended to eliminate activities related to the National Single Window (IR 2 above), rename IR 3 to IR 2, and expand the scope of the “Supply Chain Security Enhanced” to respond to NBR-requested additions to scope. Consequently, USAID assistance through BTFA is currently composed of two IRs which are described below:

IR 1: Trade-related Information & Transparency Enhanced

This IR supports compliance with the General Agreement on Tariffs and Trade (GATT) principles, which require transparency, predictability, and uniformity in the application of international trade laws, regulations, and procedures. In addition, the Revised Kyoto Convention (RKC) mandates that “Customs shall ensure that all relevant information of general application pertaining to Customs law is readily available to any interested person. At the request of the interested person, the Customs shall provide, as quickly and as accurately as possible, information relating to the specific matters raised by the interested person and pertaining to Customs law.” As a member of the WTO and candidate signatory to the RKC, Bangladesh is bound to the rules regarding trade information. IR 1 assists Bangladesh to comply with these rules by addressing existing gaps in trade-related information availability and accessibility.

IR 2: Supply Chain Security Enhanced

Increased efficiency in Bangladesh’s international commerce is the primary objective of the Trade Facilitation Activity. Security of supply chain transactions contributes significantly to this efficiency. Supply chain security in itself requires the sort of consistent, accessible, and transparent information system that the activity is helping Bangladesh establish through IR 1. It also helps ensure that the efficiency gains made possible through the upgrading of customs procedures are not compromised, or negated, by a lack of confidence in the supply chain. For example, all the time and cost gains achieved through improved and transparent processes can be neutralized if security concerns require nearly 100 percent physical inspection that is current practice at Bangladeshi ports.

The activity achieves the objectives of IR 2 through implementation of several components of the World Customs Organization (WCO) Framework of Standards to Secure and Facilitate Global Trade (SAFE):

- Authorized Economic Operator Program: BTFA is supporting the GOB in the development of a certification program that rewards compliant, low-risk traders with a variety of benefits including fewer inspections, priority treatment, reduced security and guarantee requirements, expedited release and pre-clearance, etc.
- Intelligence-led risk analysis and case management system: BTFA is supporting the GOB in the development of a national risk management system that will allow risk management criteria to be applied consistently throughout the country. This will result in enhanced intelligence capacity within Customs, which in turn will allow the agency to manage risk more effectively and develop

risk profiles for traders. Enhanced risk management capabilities will enable faster customs processing with fewer inspections at the border

- Post-clearance auditing: BTFA is helping the GOB to review and update customs legislation to allow for audits of importers' and exporters' records and inspection of their premises, develop explicit national guidelines for conducting audits, and train Customs officials in correct audit procedures.
- Expedited shipments/courier procedures: BTFA is helping the GOB to streamline processing of courier shipment procedures including reducing inspections of low-value shipments.

These components are fundamentals of SAFE and trade facilitation. BTFA is also addressing additional activities including pre-arrival processing; advanced passenger information/passenger name reference (API/PNR); non-tariff barriers; auction procedures and systems for auctioning seized/abandoned goods; domestic transit of goods under Customs control; review and update of existing Standard Operating Procedures, Statutory Regulatory Orders, instructions, guidelines, and manuals; and use of customs brokers.

EVALUATION OBJECTIVE

The purpose of the BTFA mid-term performance evaluation is to assess the extent to which the BTFA project is on track to meet its overall performance goals and inform management of any challenges or opportunities that warrant adjustments to ensure the achievement of those results. Consistent with USAID's 2011 Evaluation Policy, the primary goals of this mid-term performance evaluation are to:

- Provide evidence so USAID/Bangladesh can determine whether the BTFA project has achieved its desired results to date;
- Determine how effectively this project has implemented systems, policies, procedures, training, and other interventions that have helped to achieve its overall goal;
- Identify what course corrections, if any, are needed in the time remaining for implementation of the project; and
- Recommend to USAID key strategic and programmatic options for future trade-related engagements in Bangladesh.

With the exclusion of procurement-sensitive sections, USAID intends to disseminate the report widely to stakeholders such as USAID/Bangladesh, USAID Washington, implementing partners, relevant GOB agencies, universities, other sector-specific donors, and the Development Experience Clearinghouse (DEC).

EVALUATION QUESTIONS

The contractor's evaluation of BTFA should address the following questions:

- I. To what extent is the BTFA on track, in terms of progress and outcomes, to meet its overall objective? The response to this question should (at a minimum) address the following:
 - Improved availability, transparency, and utilization of trade-related information by the private sector
 - Tangible improvements in efficiency (i.e., reduced time and cost) of trade-related processes
 - Design and implementation of the technology components of the project, including the new Customs website, risk analysis and case management system, auction system, etc.

2. How effectively has BTFA developed a sense of ownership by the GOB of the reforms and improvements in trade-related processes?
3. To what extent will the outcome of BTFA interventions likely result in increased trade volumes?
4. What challenges has BTFA faced in implementing its activities and how has BTFA responded to those challenges? Are there any recommended alternatives to these approaches?
5. What future trade-related interventions (either current BTFA activities requiring additional support and/or new activities that are not part of BTFA's scope of work) would be necessary or very helpful to achieve the overarching objective of greater economic growth through increased trade?

EVALUATION METHDOLOGY

Based on the scope of work from USAID, the evaluation team will develop a detailed evaluation methodology and work plan for review and approval by USAID. The detailed evaluation methodology will include a data collection matrix that will explicitly link evaluation questions to particular data collection approaches and data sources. The evaluation team must use a mixed-method approach utilizing both quantitative (including non-experimental design) and qualitative analysis (such as key informant interviews, stakeholder interviews/mini-surveys, and focus group discussions). The evaluation team should develop the best evaluation design methodology in light of the evaluation questions, timeframe, budget, data collection requirements, quality of existing data sources, and potential biases. The evaluators should utilize several different, yet complementary and interrelated forms of gathering information/data such as those described below. The contractor is expected to utilize its expert judgment and evaluation best practices in selecting which methodological components to include in the evaluation design.

Document Review: Evaluation team members will review documents throughout the evaluation process including program reports and relevant studies to ensure that comprehensive and grounded best practices will be identified (see Section VI).

Key Informant Interviews: The team will conduct one-on-one interviews with a variety of stakeholders including the most relevant GOB ministries and agencies, bi and multilateral development partners supporting GOB's trade-related capacity development, business chambers and private sector firms engaged in import and/or export trade, import/export brokers, transporters, and other stakeholders involved in trade processes. This will be done administering a semi-structured or structured questionnaire.

Self-assessment: The IPs will respond to a self-assessment either through a questionnaire or standard interview checklist put together by the evaluation team and approved by USAID before use.

Expert Opinion Survey: Utilizing expert opinion is a technique used increasingly in the market system sector. The evaluation team, with approval of USAID, can apply this method as well.

Focus Group Discussions (FGDs): FGDs (small groups of 6 to 10 people) will be used to lead open discussion through a skilled moderator to gather semi-structured qualitative data. The preselected participants (balanced to the extent feasible by gender, age, and any other relevant factors) will discuss issues and concerns based on a list of key themes drawn up by the moderator. A group will address no

more than 10 questions will be addressed by. These sessions will encourage free-flowing discussion about the activity.

Mini Survey: This type of survey is small (30-40 participants) and can be performed rapidly in the field without analytical software such as SPSS or a large questionnaire. The sample size is not statistically significant; however, this type of analysis can be used to triangulate with other methods. Because of the small sample size, this type of survey can be implemented quickly when time and resources are constrained.

Economic Analysis: This type of analysis might require a sample survey. Due to time and resource constraints, the survey should be kept to a manageable size since it is neither possible nor desirable to carry out a complete census for social and economic analysis. The team should select a sample that is representative of the beneficiary population and triangulate the findings from this survey with other sources.

Regardless of data collection and analysis methods, USAID requires qualitative and quantitative data disaggregated by gender.

Methodological limitations and challenges for this evaluation are expected to include:

- Ensuring that samples of interview sources are sufficient to support evaluation findings;
- Taking systematic actions to counter any biases in (a) reporting by data collection sources and (b) interpretations of collected data by the evaluation team; and ensuring “actual” results can be measured, which will only be possible if data can be gathered and analyzed beyond respondent perceptions.

All the methodological strengths and weaknesses should be explicitly described in the evaluation report. The methodology must include a process for sharing draft findings and conclusions with key stakeholders, including beneficiaries and GOB officials, and incorporating a second round of their feedback in the final report, to be agreed upon by USAID. Prior to the start of the evaluation, the evaluation team shall meet with EG office to refine the evaluation methodology, and address any other concerns the EG office may have.

EXISTING SOURCES OF INFORMATION

The evaluation team should consult a broad range of background documents apart from project documents provided by USAID/Bangladesh. These should include, but are not limited to, documents such as the Bangladesh 6th & 7th Five Year Plans, Country Investment Plan, and Bangladesh Feed the Future Multiyear Strategy as well as other relevant national strategies and policies. USAID, ACME, and the BTFA project will provide the assessment team with a package of briefing materials, including:

- The task order for the BTFA project
- M&E plan of the BTFA project
- Project quarterly and annual reports, work plans, and management reviews developed as part of routine monitoring
- Training reports
- DQA reports
- USAID/Bangladesh Country Development Cooperation Strategy 2011-16 (Public version)

- USAID Bangladesh DO2 PMP
- Technical/Project proposal
- Any other relevant reports (inception, expo, fairs, etc.)
- Case and success stories – if any
- Any research/study reports (e.g., gap study, sector study, BCC study) – if any
- Name of partners with contact details – international and national NGOs
- MOU/Agreement signed with GOB wings – Customs, National Board of Revenue, etc.
- Performance Indicator Tracking Table (PITT)
- Beneficiary database
- Training database
- Training modules
- Training reports – if any
- M&E/data collection tools
- Year-wise project expenditure
- One pager/brochure/pamphlet – if available
- Project organogram
- World Bank Regional Connectivity Project I Document (Component 3 is to implement the National Single Window in Bangladesh) GIZ (SAARC Trade Promotion Network)

EVALUATION TEAM COMPOSITION

The evaluation team will consist of the following key personnel.

Team Leader/Evaluation Specialist (International):

The Team Leader should have a post-graduate degree in economics, business/commerce, international trade, or an applicable social sciences field. The Team Leader will be an international expert and should have a minimum of 10 years of work experience. S/he should have demonstrated experience of leading at least two evaluations of projects with similar scope and complexity within the last 5-6 years.

S/he should have extensive experience in conducting quantitative and qualitative evaluations and strong familiarity with business, trade, and supply chain development. The Team Leader must be familiar with USAID regulations and systems including performance monitoring and evaluation guidance. Experience in international donor development program management is preferred. Excellent oral and written skills in English are required. Relevant experience in Bangladesh or South Asia is preferred.

The Team Leader will provide overall leadership for the team, and s/he will finalize the evaluation design, coordinate activities, arrange periodic meetings, consolidate individual input from team members, and coordinate the process of assembling the final findings and recommendations into a high-quality document. S/he will lead the preparation and presentation of the key evaluation findings and recommendations to the USAID/Bangladesh team and major stakeholders.

Customs/Trade Specialist (International):

The Customs/Trade Specialist will have a post-graduate degree in economics, business/commerce, international trade, or any other relevant subject. S/he will be an international expert with a minimum of 8 years of experience in customs, international trade, management, and evaluation. S/he will have very

good understanding of customs systems, processes, and policies including such areas as authorized economic operator programs, post-clearance audit, trade auction procedures, trade intelligence and risk management, transit procedures, and non-tariff barriers. S/he should have demonstrated knowledge of the latest developments and best practices in customs and international trade. Excellent oral and written skills in English are required. Familiarity with USAID regulations and systems including performance monitoring guidance, evaluation guidance, gender policies and guidance, and project management is preferred. Relevant experience in Bangladesh or South Asia is preferred.

S/he will participate in team meetings, key informant interviews, group meetings, site visits, and draft the sections of the report relevant to his/her expertise and role in the team. S/he will also participate in presenting the report to USAID or other stakeholders and be responsible for addressing pertinent comments provided by USAID/Bangladesh or other stakeholders.

Customs/Trade Specialist (Local):

The Local Customs/Trade Specialist will have a degree in economics, business/commerce, international trade, or any other relevant subject. S/he will be an experienced Customs professional with a minimum of 10 years of experience working in Bangladesh Customs and National Board of Revenue. S/he will have very detailed understanding of Bangladesh customs systems, processes, policies, culture, and management. Good oral and written skills in English are required. Experience in assessments and evaluations preferred.

S/he will participate in team meetings, key informant interviews, group meetings, site visits, and provide key insights regarding Bangladesh Customs and the National Board of Revenue to the team. S/he will also participate in presenting the report to USAID or other stakeholders and be responsible for addressing pertinent comments provided by USAID/Bangladesh or other stakeholders.

Information Technology (IT) Specialist (Local):

The IT Specialist will have a graduate degree in computer science, information technology, management information system or any other relevant subject. S/he will be a Bangladeshi national with 5-8 years of experience in such areas as website design, database and application management, and/or information system operation, especially related to trade/customs or other government systems. Good oral and written skills in English are required. Knowledge and familiarity with Customs information systems preferred. Familiarity with/knowledge of Customs auction procedures, trade intelligence, risk management and risk-based selection of cargo for examination, and domestic transit procedures is preferred.

S/he will participate in team meetings, key informant interviews, group meetings, site visits, and draft the sections of the report relevant to his/her expertise and role in the team. S/he will also participate in presenting the report to USAID or other stakeholders and be responsible for addressing pertinent comments provided by USAID/Bangladesh or other stakeholders.

Conflict of Interest

All evaluation team members will provide a signed statement attesting to a lack of conflict of interest, or describing an existing conflict of interest relative to the project being evaluated. USAID will provide the conflict of interest forms.

SCHEDULE, LEVEL OF EFFORT, AND LOGISTICS

Schedule

Work is to be carried out over a period of approximately 10 weeks, beginning in March 2017 with field work completed by the end of April 2017 and final report and close out concluding in early May 2017. See Annex I for Bangladesh Mission Holiday Schedule.

A six-day work week (Saturday-Thursday) is authorized for the evaluation team while in Bangladesh. The evaluation team will submit a work plan as part of the evaluation methodology proposal with timeline and develop a GANTT chart displaying the time periods during which activities occur.

Pre-departure arrangements should include: travel approval; airline tickets; visa; lodging; work facility and vehicle transport arrangements; dates for meetings with USAID/Bangladesh EG staff and key contacts; in-country travel agenda; and accommodations.

Estimated Level of Effort (LOE)

Level of Efforts of Team Members by Task Deliverables				
Task/Deliverable	Duration / LOE Days			
	Team Leader	Int'l Customs Trade Specialist	Local Customs Specialist	Local IT Specialist
Review background documents and home-based preparation work	5	5	5	3
Travel to Bangladesh	2	2	0	0
Team planning meeting and meeting with USAID	2	2	2	2
Development of Evaluation Work Plan (concurrent with document review and initial meetings)	2	2	2	2
Development of data collection instruments	2	2	2	2
Information and data collection. Includes interviews with key informants (stakeholders and USAID staff) and site visits	15	15	15	10
Discussion, analysis, and preliminary draft evaluation report in country including discussion with USAID	5	5	5	5
Debrief meetings with USAID (preliminary draft report due to USAID)	1	1	1	1

Level of Efforts of Team Members by Task Deliverables				
Task/Deliverable	Duration / LOE Days			
	Team Leader	Int'l Customs Trade Specialist	Local Customs Specialist	Local IT Specialist
Debrief meetings with key stakeholders	1	1	1	1
Depart Bangladesh/Travel to U.S.	2	2	0	0
Finalization of draft and internal review (out of country). Draft must be submitted within 10 working days after the departure of international team lead.	10	5	3	3
USAID provides comments on draft report	0	0	0	0
Team revises draft report and submits final to USAID (out of country)	5	5	4	2
Total Estimated LOE	52	47	40	31

DELIVERABLES

All deliverables are internal to USAID and the evaluation team unless otherwise instructed by USAID. Evaluation deliverables are indicated below:

Evaluation Team Planning Meeting: During the meeting, the team should review and discuss the SOW in its entirety, clarify team member roles and responsibilities, prepare the work plan, develop data collection methods, review and clarify any logistical and administrative procedures for the assignment and instruments, and prepare for the in-brief with USAID/Bangladesh.

Work Plan: Prior to initiation of the evaluation activities, the evaluation team will provide a detailed initial work plan to the ACME COR. The ACME COR will provide any necessary feedback or edits to the work plan, after which the evaluation team will have three days to submit a final version of the document. The initial work plan will include a task timeline, a description of the methodology to answer each evaluation question, team responsibilities, document review process, key informant and stakeholder meetings, site visits, survey implementation (if applicable), data analysis, travel time, debriefings (for USAID, implementing partner, and relevant GOB officials, and draft and final report writing. The work plan will be submitted to the ACME COR and BTFA COR at USAID/Bangladesh for approval no later than the 5th day after the evaluation team arrives in Bangladesh.

In-briefing Meeting: The evaluation team will meet with USAID/Bangladesh within two working days of the international team members' arrival in Bangladesh.

Evaluation Design Matrix: A table should list each evaluation question and the corresponding information sought, information sources, data analysis methods, and limitations. The matrix should be finalized and shared with USAID/Bangladesh before evaluation fieldwork starts. It should also be included as an annex in the evaluation report.

Data Collection Instruments: Development and submission of data collection instruments to USAID/Bangladesh should occur during the design phase and after the evaluation is completed.

Regular Updates: The Evaluation Team Leader will brief the ACME COR, ACME COP, the BTFA COR, and any other designated evaluation POC on progress with the evaluation on at least a weekly basis, in person or by electronic communication. Any delays must be quickly communicated to USAID/Bangladesh as early as possible to allow quick resolution and to minimize any disruptions to the evaluation. Emerging opportunities to strengthen the evaluation should also be discussed with USAID/Bangladesh as they arise.

Preliminary Draft Evaluation Report: The evaluation team will submit a Preliminary Draft Evaluation Report to the ACME COR, BTFA COR, and ACME COP five working days before the Mission debriefing. Within three working days after receipt, USAID staff will provide preliminary comments prior to the Mission debriefing.

Debriefing with USAID: The evaluation team will present the major evaluation findings to USAID/Bangladesh through a PowerPoint presentation before the team's departure from Bangladesh. The debriefing will include a discussion of achievements and issues as well as any preliminary findings. The team will consider USAID comments and incorporate them as appropriate in the Draft Evaluation Report.

Draft Evaluation Report: A draft report on the findings and recommendations should be submitted to USAID/Bangladesh and ACME within 10 business days after departure of the international team members from Bangladesh. The written report should clearly describe findings, conclusions, and recommendations. The draft report must be of high quality with no grammatical errors or typos. USAID will return the report if this requirement is not met. A report is high quality when it represents a thoughtful, well-researched, and well-organized effort to objectively evaluate what worked in the project, what did not and why. The draft report must have well-constructed sentences that are presented in a way that clearly presents findings, conclusions and recommendations. The report should answer all the evaluation questions and the structure of the report should make it clear how the questions were answered. The draft report must meet the criteria set forth under the Final Report section below.

Final Evaluation Report: The evaluation team will submit the Final Evaluation Report that incorporates Mission comments and suggestions no later than 10 working days after USAID/Bangladesh provides written comments on the Draft Evaluation report. The format of the final report is provided below. The report will be submitted electronically in English.

The final report should meet the following criteria to ensure the quality of the report:

- The evaluation report should represent a thoughtful, well-researched, and well-organized effort to objectively evaluate what worked in the project, what did not and why.

- The evaluation report shall address all evaluation questions included in the scope of work.
- The evaluation report should include the scope of work as an annex. All modifications to the scope of work, whether in technical requirements, evaluation questions, evaluation team composition, methodology, or timeline need to be agreed upon in writing by the ACME COR and BTFA COR.
- The evaluation methodology shall be explained in detail and all tools used in conducting the evaluation, such as questionnaires, checklists, and discussion guides will be included in an annex in the final report.
- Limitations to the evaluation shall be disclosed in the report, with particular attention to the limitations associated with the evaluation methodology (selection bias, recall bias, etc.).
- Evaluation findings should be presented as analyzed facts, evidence, and data and not based on anecdotes, hearsay, or the compilation of people’s opinions. Findings should be specific, concise and supported by strong quantitative or qualitative evidence.
- Sources of information need to be properly identified and listed in an annex.
- Recommendations need to be supported by a specific set of findings.
- Recommendations should be action-oriented, practical, and specific, with defined responsibility for the action.

REPORTING REQUIREMENTS

The total pages of the final report, excluding references and annexes, should be no more than 30 pages. The following content (and suggested length) should be included in the report:

- **Table of Contents**
- **List of Acronyms**
- **Executive Summary** – concisely state the project purpose and background, key evaluation questions, methods, most salient findings and recommendations (2-3 pp.);
- **Introduction** – country context, including a summary of any relevant history, demography, socio-economic status, etc. (1 pp.);
- **The Development Problem and USAID’s Response** – brief overview of the development problem and USAID’s strategic response, including design and implementation of the BTFA project and any previous USAID projects implemented in response to the problem (2-3 pp.);
- **Purpose of the Evaluation** – purpose, audience, and synopsis of task (1 pp.);
- **Evaluation Methodology** – describe evaluation methods, including strengths, constraints, and gaps (1 pp.);
- **Findings and Conclusions** – describe and analyze findings for each evaluation question using graphs, figures, and tables, as applicable, and also include data quality and data sources, issues, and outcomes. Conclusions should be credible and should be supported by the findings (12-15 pp.);
- **Recommendations** – prioritized for each evaluation question; should be separate from conclusions and be supported by clearly defined set of findings and conclusions. Include recommendations for future project implementation or relevant program designs, as well as synergies with other USAID projects and other donor interventions as appropriate (3-4 pp);
- **Lessons Learned** – provide a brief of key technical and/or administrative lessons on what has worked, not worked, and why for future project or program designs (2-3 pp.);
- **Annexes** – to include statement of work, documents reviewed, bibliographical documentation, evaluation methods, data generated from the evaluation, tools used, interview lists, meetings,

FGDs, surveys, and tables. The Evaluation Design Matrix must be presented as an annex to the report. Annexes should be succinct, pertinent, and readable. Annexes should also include, if necessary, a statement of significant unresolved differences of opinion by funders, implementers, or members of the evaluation team on any of the findings or recommendations.

The report format should be restricted to Microsoft products and 12-point type font should be used throughout the body of the report, with page margins one-inch top/bottom and left/right.

The final report will be edited and formatted by the evaluation team and provided to USAID/Bangladesh 5 working days after the Mission has reviewed the content and approved the final revised version of the report.

A second, public version of the evaluation report, excluding any potentially procurement-sensitive or host country-sensitive information, will be submitted (also electronically, in English) to the Development Experience Clearinghouse (DEC) and disseminated among implementing partners and other stakeholders within 10 days following approval from USAID.

All quantitative data, if gathered, should be (1) provided in an electronic file in easily readable format; (2) organized and fully documented for use by those not fully familiar with the project or the evaluation; (3) owned by USAID and made available to the public barring rare exceptions and excluding procurement-sensitive information. A thumb drive with all the data could be provided to the ACME COR.

LOGISTIC SUPPORT

USAID/Bangladesh's ACME project will be responsible for all offshore and in-country administrative and logistical support, including identification and fielding appropriate local staff. They will take care of arranging and scheduling meetings, international and local travel, hotel bookings, working/office spaces, computers, printing, and photocopying. A local administrative assistant may be hired to arrange field visits, local travel, hotel, and appointments with stakeholders and provide translation.

ANNEX 6: BIBLIOGRAPHY

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ANNEX 7: TEAM COMPOSITION AND CONFLICT OF INTEREST FORMS

Serving as *Evaluation Team Leader*, Dr. Savitri Singh holds a JD in International Trade Law from Georgetown University Law Center in USA. Dr. Singh has over 25 years of international trade law and policy, custom and trade facilitation experience and 7 years of experience leading evaluations teams. She has also conducted numerous assessments and provided technical advising on issues of trade, transit, policy, economics, customs, and agriculture. Dr. Singh is a trade specialist and has served in advisory roles for a variety of international donors, trade organizations, and host governments. She has also lectured on international trade, customs, and the WTO on several occasions. Dr. Singh has experience working in Afghanistan and Pakistan and has studied Arabic and Dari. In addition, Dr. Singh has worked in Iraq, Egypt, Morocco, and West Africa.

In the role *International Customs and Trade Specialist*, D. (Bonni) van Blarcom has a PhD in Economics from the University of Reading and a Master's Degree in International Affairs from Columbia University. Dr. Blarcom has over 35 years of international experience with customs, international trade, trade facilitation, legal regulatory reform, and project management and evaluation. Her trade policy reform experience has included working on regional forums such as Asia-Europe Meeting (ASEM) and ASEAN, and she is familiar with WTO law. She has evaluated and proposed legislation and reforms in many countries and regions and provided best practices recommendations. Dr. Blarcom has worked in Afghanistan, Pakistan, Bangladesh, Bhutan, India and Nepal. Most recently she completed assignments researching Bangladesh's data on customs performance.

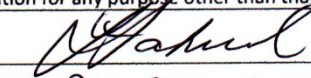
Acting in the role of *Local Customs and Trade Specialist*, Mr. Hussain Ahmed brings a LLB and LL.M from University of Dhaka. Mr. Ahmed has over 30 years of Bangladesh trade law and policy, custom and trade facilitation experience. He held various positions during his tenure with the Government of Bangladesh. Including but not limited to, Field Administration of Customs, Excise and Vat at various levels including Commissioner of customs, Policy units at National Board of Revenue, Director of Export Promotion Bureau, Commercial Counsellor to the Embassy of Bangladesh in Japan, and President of Customs, Excise and VAT. Mr. Ahmad has worked with custom and tax for more than three decades, his wide range of experience with custom/tax covers: Customs duty, bonded goods, Auction, Export works, Adjudication and Administrative works, Collection of VAT and monitoring VAT offices, VAT related adjudication, works directed by NBR.

As the *Local IT Specialist*, Mr. Mohammad Rayan Sharif holds a Master of Science in Computer Science from Independent University, Bangladesh. Mr. Rayan Sharif is a Bangladeshi national with more than 12 years of professional experience working in several projects with government, private, and foreign organizations. Most of his work has been related to development, systems analysis and solution design, data security, database modeling and core project management. In addition, he worked as Information Technology Specialist for the USAID-funded Catalyzing Clean Energy Bangladesh (CCEB) project, where he delivered the conceptual design of a proposed Electronic Case Docketing System & Electronic Data Management System at Bangladesh Energy Regulatory Corporation (BERC). He is familiar with the customs information system, having worked with the NBR (Tax department) for a period.

Disclosure of Conflict of Interest for USAID Evaluation Team Members

Name	Hussain Ahmed
Title	Local Customs and Trade Specialist
Organization	IBTCI
Evaluation Position?	<input type="checkbox"/> Team Leader <input checked="" type="checkbox"/> Team member
Evaluation Award Number (contract or other instrument)	AID-388-C-14-00001
USAID Project(s) Evaluated (Include project name(s), implementer name(s) and award number(s), if applicable)	Bangladesh Trade Facilitation Activity Implementer: IBI International Contract No: AID-388-TO-13-00002
I have real or potential conflicts of interest to disclose.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes answered above, I disclose the following facts: <i>Real or potential conflicts of interest may include, but are not limited to:</i> 1. Close family member who is an employee of the USAID operating unit managing the project(s) being evaluated or the implementing organization(s) whose project(s) are being evaluated. 2. Financial interest that is direct, or is significant though indirect, in the implementing organization(s) whose projects are being evaluated or in the outcome of the evaluation. 3. Current or previous direct or significant though indirect experience with the project(s) being evaluated, including involvement in the project design or previous iterations of the project. 4. Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose project(s) are being evaluated. 5. Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose project(s) are being evaluated. 6. Preconceived ideas toward individuals, groups, organizations, or objectives of the particular projects and organizations being evaluated that could bias the evaluation.	

I certify (1) that I have completed this disclosure form fully and to the best of my ability and (2) that I will update this disclosure form promptly if relevant circumstances change. If I gain access to proprietary information of other companies, then I agree to protect their information from unauthorized use or disclosure for as long as it remains proprietary and refrain from using the information for any purpose other than that for which it was furnished.

Signature	
Date	JUNE 24, 2017

Disclosure of Conflict of Interest for USAID Evaluation Team Members

Name	RAYAN SHARIF
Title	IT SPECIALIST
Organization	IBTCI
Evaluation Position?	<input type="checkbox"/> Team Leader <input checked="" type="checkbox"/> Team member
Evaluation Award Number (contract or other instrument)	
USAID Project(s) Evaluated (Include project name(s), implementer name(s) and award number(s), if applicable)	Midterm Evaluation on BTFA
I have real or potential conflicts of interest to disclose.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes answered above, I disclose the following facts: <i>Real or potential conflicts of interest may include, but are not limited to:</i> <ol style="list-style-type: none"> 1. Close family member who is an employee of the USAID operating unit managing the project(s) being evaluated or the implementing organization(s) whose project(s) are being evaluated. 2. Financial interest that is direct, or is significant though indirect, in the implementing organization(s) whose projects are being evaluated or in the outcome of the evaluation. 3. Current or previous direct or significant though indirect experience with the project(s) being evaluated, including involvement in the project design or previous iterations of the project. 4. Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose project(s) are being evaluated. 5. Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose project(s) are being evaluated. 6. Preconceived ideas toward individuals, groups, organizations, or objectives of the particular projects and organizations being evaluated that could bias the evaluation. 	


I certify (1) that I have completed this disclosure form fully and to the best of my ability and (2) that I will update this disclosure form promptly if relevant circumstances change. If I gain access to proprietary information of other companies, then I agree to protect their information from unauthorized use or disclosure for as long as it remains proprietary and refrain from using the information for any purpose other than that for which it was furnished.

Signature	Rayan  Rayan Sharif
Date	20/6/2017

Disclosure of Conflict of Interest for USAID Evaluation Team Members


Name	Dr. D. (Bonni) van Blarcom
Title	International Customs/Trade Specialist
Organization	IBTCI
Evaluation Position?	<input type="checkbox"/> Team Leader <input checked="" type="checkbox"/> Team member
Evaluation Award Number (contract or other instrument)	Task Order AID-388-TO-13-00002
USAID Project(s) Evaluated (Include project name(s), implementer name(s) and award number(s), if applicable)	Bangladesh Trade Facilitation Activity IBI International
I have real or potential conflicts of interest to disclose.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes answered above, I disclose the following facts: <i>Real or potential conflicts of interest may include, but are not limited to:</i> <ol style="list-style-type: none"> 1. Close family member who is an employee of the USAID operating unit managing the project(s) being evaluated or the implementing organization(s) whose project(s) are being evaluated. 2. Financial interest that is direct, or is significant though indirect, in the implementing organization(s) whose projects are being evaluated or in the outcome of the evaluation. 3. Current or previous direct or significant though indirect experience with the project(s) being evaluated, including involvement in the project design or previous iterations of the project. 4. Current or previous work experience or seeking employment with the USAID operating unit managing the evaluation or the implementing organization(s) whose project(s) are being evaluated. 5. Current or previous work experience with an organization that may be seen as an industry competitor with the implementing organization(s) whose project(s) are being evaluated. 6. Preconceived ideas toward individuals, groups, organizations, or objectives of the particular projects and organizations being evaluated that could bias the evaluation. 	

I certify (1) that I have completed this disclosure form fully and to the best of my ability and (2) that I will update this disclosure form promptly if relevant circumstances change. If I gain access to proprietary information of other companies, then I agree to protect their information from unauthorized use or disclosure for as long as it remains proprietary and refrain from using the information for any purpose other than that for which it was furnished.

Signature	
Date	20 June 2017

ANNEX VI: DISCLOSURE OF ANY CONFLICTS OF INTEREST

The Evaluation Policy requires that evaluation reports include a signed statement by each evaluation team member regarding any conflicts of interest. A suggested format is provided below.

Name	SARITA Singh
Title	
Organization	
Evaluation Position	<input checked="" type="checkbox"/> Team Leader <input type="checkbox"/> Team member
Evaluation Award Number (contract or other identifier) USAID Project(s) Evaluated (include project name(s), implementer name(s) and award number(s), if applicable)	
I have read or potential conflicts of interest to disclose. If yes answered above, I disclose the following factor: For potential conflicts of interest may include, but are not limited to: 1. Close family members who are employees of the USAID receiving unit, including the implementer being evaluated or the implementing organization(s) whose project(s) are being evaluated. 2. Issues or interest that I direct or in significant degree interest in the implementing organization(s) whose project are being evaluated or in the nature of the contract. 3. Current or previous direct or significant organizational relationships with the partner(s) being evaluated, including a relationship in the project design or contract execution of the project. 4. Current or previous work experience or consulting employment with the USAID agency and managing the evaluation or the implementer organization, whose projects are being evaluated. 5. Current or previous work experience and an organization that may be a main or secondary contractor with the implementing organization(s) whose projects are being evaluated. 6. Personal relationships with individuals, groups, organizations, or departments of the partner organization and organizations being evaluated that could identify, influence.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
<p>I certify (1) that I have completed this disclosure form fully and to the best of my ability and (2) that I will update this disclosure form promptly if relevant circumstances change. If I gain access to proprietary information of other companies, then I agree to protect their information from unauthorized use or disclosure for as long as it remains proprietary and refrain from using the information for any purpose other than that for which it was furnished.</p>	
Signature	
Date	June 20, 2017

U.S. Agency for International Development

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