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ROLE OF CUSTOMS IN MITIGATING THE EFFECTS OF THE COVID-19 PANDEMIC

Progress report on the implementation of the Council Resolution on the Role of Customs in Facilitating the Cross-Border Movement of Situationally Critical Medicines and Vaccines

(Item IV on the Agenda)

SUMMARY

Purpose of the document

The purpose of this document is to provide the Permanent Technical Committee (PTC) with a progress report on the implementation of the Council Resolution on the Role of Customs in Facilitating the Cross-Border Movement of Situationally Critical Medicines and Vaccines. The report highlights, *inter alia*, the support provided in the framework of the WCO COVID-19 and Operation STOP II Projects.

Actions required by the PTC

The PTC is kindly invited to:

- Take note of the progress on the implementation of the Council Resolution on the Role of Customs in Facilitating the Cross-Border Movement of Situationally Critical Medicines and Vaccines ;
- Examine and discuss the annexed Self-assessment checklist and if appropriate, endorse it;
- Provide guidance on the way forward.

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I. Background

1. In December 2020, the WCO Council endorsed the [Resolution on the Role of Customs in Facilitating the Cross-Border Movement of Situationally Critical Medicines and Vaccines](#) (the Resolution). The Resolution outlines a series of 17 measures, which relate to specific actions that the WCO as a whole commits to apply. Twelve of these measures are addressed to Members as actions to be implemented immediately at the policy and operational level in order to adequately facilitate and control the cross-border movement of these critical goods. Four specific measures are addressed to the Secretariat as areas where a strong focus is needed in order to provide Members with all the assistance and support needed in this context. Lastly, one measure defines responsibilities for monitoring the implementation of the Resolution.
2. Through measure 13 of the Resolution, the Secretariat has been tasked to develop and implement a dedicated action plan to enable Members to respond to the COVID-19 pandemic in an agile and effective manner. In this context, the Secretariat established the COVID-19 Action Plan covering a period of 18 months going from January 2021 to June 2022 and encompassing a set of 25 specific actions.
3. In this document, the PTC will be provided with a report on the progress achieved in implementing the Resolution and the COVID-19 Action plan, with a specific focus on the activities under the COVID-19 and Operation STOP II Projects.

II. Intersessional developments

1. Facilitation activities

• Development and update of tools and guidance materials

4. In February 2022, the Secretariat updated the Harmonised System (HS) classification reference lists for medical supplies, priority medicines, medical substances, and vaccines and related equipment to reflect the amendments to the HS 2022 edition. The lists are available on the dedicated sections of the WCO web-site. Details about an update of the WCO Guidelines on Disaster Management and Supply Chain Continuity are provided in paragraphs 13 and 14 below.
5. The actions in the COVID-19 Action Plan related to the comprehensive review of the Revised Kyoto Convention and the review of the SAFE Framework of Standards are progressing on track.

• Sharing of information and good practices

6. On 9 September 2021, the WCO Secretary General wrote to certain Members with available production and/or fill-and-finish capacity to highlight the need for prioritising and facilitating the Customs clearance of any inputs and components used for the manufacturing, distribution and administering of COVID-19 vaccines, as well as to collect information on Members' best practices and experiences. As of early March 2022, five Members have submitted their practices related to the COVID-19 vaccine manufacturing inputs and components. The Members' practices are available on the dedicated [section](#) of the WCO web-site. The Secretariat reiterates the importance of facilitating the cross-border movement not only of the COVID-19 vaccines, but also of the inputs and components necessary for their manufacturing, distribution and administering.

• **Cooperation with other international organizations and supply chain stakeholders**

7. In the implementation of the COVID-19 Action Plan, the WCO enjoys excellent cooperation with a big number of partner international organizations and supply chain stakeholders, among which the World Health Organization (WHO), the World Trade Organization (WTO), the United Nations Office for the Coordination of Humanitarian Affairs (UN OCHA), the International Federation of Red Cross and Red Crescent Societies (IFRC), etc. The WCO Secretary General and Deputy Secretary General take part in the monthly meetings of the WCO Private Sector Consultative Group (PSCG) and discuss with the private sector various COVID-19-related challenges and the role of Customs and the WCO in addressing these challenges.

2. The WCO COVID-19 Project

• **Capacity building**

8. Since the 233rd /234th PTC sessions held in October 2021, the COVID-19 Project team organized or is in the process of organizing a number of capacity building activities. As of 7 March 2022, 6 activities were delivered and 5 are in preparation. The below table provides a summary of the activities:

Activity	Region	Dates	Status
WCO online workshop to assist Guatemala Customs in drafting Standard Operating Procedures (SOPs) for the clearance and regularization of relief goods in case disruptive events	AMS	5-8 October 2021	Delivered
WCO online sub-regional workshop to assist Pacific Islands in improving their capacity in the clearance and regularization of relief goods in case of disruptive events	AP	19-21 and 26 October 2021	Delivered
WCO online sub-regional workshop to assist Central American Customs Committee Members in improving their capacity in the processing of relief goods in case of disruptive events	AMS	15 -17 November 2021	Delivered
WCO national workshop to improve the ability of Comoros Customs to manage the risks stemming from disruptive events (in person)	ESA	17-21 January 2022	Delivered
WCO online workshop to assist Angola Revenue administration in drafting	ESA	14-16 February 2022	Delivered

Standard Operating Procedures (SOPs) for the processing of the relief goods in case of natural disasters and other disruptive events			
WCO workshop to assist Madagascar Customs and other stakeholders in responding to the tropical cyclone season (in person)	ESA	4 and 11 February 2022	Delivered
WCO Sub-Regional workshop on disaster management and supply chain continuity in the context of the COVID-19 pandemic: sharing of experiences and lessons learned (in Uzbekistan)	EUR	28-30 March 2022	In preparation
National workshop to assist Dominican Republic Customs in improving capacity in processing relief consignments	AMS	25- 28 April 2022	In preparation
National workshop to assist Haiti Customs in improving capacity in processing relief consignments	AMS	May	(TBC)
National workshop to assess the response of Tonga to the volcanic eruption and tsunami	AP	11-12 April 2022	(TBC)
Regional workshop for Europe region on disaster management and supply chain continuity: sharing experiences and lessons learnt from the COVID-19 pandemic	EUR	9-11 May 2022	(TBC)

9. The above-mentioned workshops brought together a high number of delegates representing not only Customs administrations, but also other relevant government agencies (health authorities, other border agencies, etc.) and the humanitarian community (NGOs, UN agencies, etc.). During these events, participants learnt about the WCO tools and instruments in the area of disaster relief and others elaborated in response to the COVID-19 pandemic such as the Guidelines on disaster management and supply chain continuity, the Resolution on role of Customs in facilitating the cross-border movement of situationally critical medicines and vaccines, and other instruments and tools relevant to the area of disaster relief.
10. The core activities of several workshops consisted in formulating recommendations to improve the processing of relief consignments and the drafting of Standard Operating Procedures (SOPs) for the clearance of medicines and similar critical goods in case of disruptive events such as COVID-19.

11. The drafting of SOPs is particularly helpful, but should be complemented by simulation exercises to test, review and validate them. For this reason, the COVID-19 Project, in cooperation with the Global Alliance for Trade Facilitation (GATF) and the National Center for Disaster Preparedness (NCDP) of Columbia University, organized an in-person activity for Madagascar in February 2022 to assist Customs and other stakeholders in preparing for the tropical cyclone season in the context of the COVID-19 pandemic.
12. This activity served as an opportunity to provide a training environment for emergency management, to evaluate disaster response plans, policies and procedures, and to develop an in-house capacity to conduct exercises, thus improving the overall resilience of Madagascar's disaster governance in accordance with national and international response mechanisms.

• Update of the WCO Guidelines on disaster management and supply chain continuity

13. In order to assist Customs administrations in implementing the WCO Guidelines on disaster management and supply chain continuity and assessing their level of preparedness to face disruptive events such as COVID-19 and natural disasters a Self-Assessment Checklist was developed and will be added as an annex to the Guidelines. The Self-Assessment Checklist is appended at Annex I hereto.
14. The self-assessment check-list is intended to provide to Customs administrations an evaluation tool that will help in analysing the gap between the measures in place to face emergency situations and those that need to be implemented. It will help in identifying their needs and undertaking more actions to enhance the level of preparedness to respond effectively and efficiently to any disruptive event in the future.

• The procurement of Mobile App and IT equipment

15. Fostering the protection of Customs staff while facilitating the control and screening of passengers is critical in the event of infectious diseases such as COVID-19. The COVID-19 Project is currently providing technical support and IT equipment to three WCO Members (Benin, Cameroon and Madagascar). The technical support consists of a Mobile App and related hardware (iPads) for the submission of Customs declarations by inbound passengers that will help in limiting physical contact between passengers and Customs personnel at entry points. The development of the mobile app was finalized and the procurement of the needed equipment is under way.

3. Enforcement and compliance activities

• I2C's COVID-19

16. The WCO's Information and Intelligence Centre (I2C) in collaboration with the COVID-19 Project continues to monitor and share the latest information on Customs-related developments surrounding the COVID-19 pandemic.
17. I2C distributes a monthly Open Source News Review both to WCO management and Members. It provides readers with an overview of recent Customs-related developments on a variety of COVID-19 compliance and facilitation focused topics. The Open Source News Review has identified the following trends: increased crackdowns on a number of counterfeiting rings which were set up during the pandemic to take advantage of certain high-demand products including hand sanitizer/personal protective equipment (PPE) and COVID-19 vaccination certificates; an increase in the

sale of illegally sourced/homemade spirits in several countries across Southern Africa, in response to those countries' COVID-19 restrictions; and reports by a number of countries of increased use of encrypted messaging applications, such as Telegram, which are being utilized by criminals to sell a variety of illicit goods including drugs and counterfeit COVID-19 vaccination certificates.

• **Operation STOP II project**

18. Operation STOP II is the largest-ever Customs-led global operation involving 146 Member Customs administrations, with the support of a number of international organizations and pharmaceutical companies. It is aimed at cracking down on the illicit trade in medicines, vaccines and medical devices related to COVID-19.

19. The developments with respect to Operation STOP II are significant and can be summarized as follow:

• **Global webinars: awareness about COVID-19 vaccines and capacity-building activities**

20. In order to raise awareness about COVID-19 vaccines, the Secretariat successfully carried out five series of webinars in collaboration with Pfizer, Moderna, AstraZeneca, Johnson & Johnson and Sinopharm. The 16 webinars, which brought together nearly 2,000 participants in total, focused on the essential specifications of COVID-19 vaccines as well as details of their distribution patterns, the aim being to make Customs better equipped to identify counterfeit or sub-standard COVID-19 vaccines at borders and curb trafficking, notably during this important period of vaccine delivery to governments. These series of webinars represent the WCO Secretariat's response to ensuring the full preparedness of Members for the safe and seamless distribution of time- and temperature-sensitive vaccines, as well as to prevent organized criminal organizations from exploiting the situation by flooding the markets with dangerous, sub-standard or counterfeit vaccines. This constructive collaboration with the private sector made it possible to obtain intelligence and alerts to update the risk criteria during the operation.

21. Some 10 regional workshops were conducted to ensure the smooth implementation of Operation STOP II. Five more dedicated training activities were held for National Contact Points (NCPs) and Regional Intelligence Liaison Offices (RILOs).

• **Visibility and cooperation with other international organizations**

22. International organizations (Europol, INTERPOL, OLAF, UNODC and WHO) support Operation STOP II. This cooperation is reflected in intelligence sharing, investigation and capacity-building activities.

23. The operation was promoted and its visibility enhanced through various high level events, such as the Joint OECD-EUIPO Workshop on the Misuse of Maritime Transport for Counterfeit Trade (October 2021); etc.

• **Relevant tools and Improvements to IPR CENcomm 3, including the COVID-19 pre-arrival template**

24. On 1 April 2020 the Secretariat issued the "WCO COVID-19 Checklist for Customs Enforcement", which aims to assist Members in distinguishing genuine medicines and medical products from counterfeits more effectively. In connection with Operation STOP II, the Secretariat has updated the Checklist to take into account new

trends related to the COVID-19 vaccines. The Checklist is shared with frontline officers, who may encounter situations where counterfeit or substandard medicines, vaccines and medical supplies are crossing borders. The “CEN Tips on Medicine and Pharmaceutical Products” have been updated. A user guide on how to report seizures in CENcomm has been prepared and shared accordingly.

25. CENcomm 3, the upgraded version of CENcomm 2, was used as a communication tool during Operation STOP I and II. For enhanced analysis and greater user-friendliness, some improvements have been made to the functionalities. To date 176 countries, totalling 616 users, are involved in IPR CENcomm. Since April 2021, IPR CENcomm has featured a COVID-19 pre-arrival information template. The IPR CENcomm COVID-19 pre-arrival information template is aimed at facilitating the Customs-to-Customs exchange of non-nominal data and at supporting Members in tackling the challenges associated with the requirement for a proper legal basis for the exchange of information. To strengthen cooperation with the private sector, a dedicated “Rights Holders' Corner” has been created for inputting essential information that can help in the fight against counterfeiting and piracy. To facilitate rapid reporting of seizures, even in the field, an IPR CENcomm mobile shortcut has also been developed.

• Operation STOP II: Communication Plan

26. A Communication Plan for Operation STOP II was also developed, bearing in mind the WCO's approach to strategic communication. The Communication Plan is aimed at increasing the visibility of Customs, strengthening collaboration with stakeholders and engaging in meaningful discussion with Members to enhance the WCO's tools and instruments. It comprises a plan of action with specific tasks and timescales and lists the available channels and tools to ensure the right messages reach the target audiences. A film on fake medicines was produced by the BBC in Benin to promote Operation STOP II. The film was released in September 2021.
27. To highlight the important role played by Customs in protecting society during the pandemic, a five-minute corporate video was produced and shared via social media: <https://youtu.be/Q2hWJfjbTI>.

• Operation STOP II report: launch event and outcomes

28. The coordinated Customs Operation (STOP II) was aimed at intercepting, seizing and destroying cross-border consignments of illicit vaccines, medicines and medical supplies and other illicit goods related to COVID-19. The results of the operation reaffirmed the important dual role that Customs plays in facilitating the legal supply chain of COVID-19 vaccines, medicines and other medical goods while protecting society. The key outcomes were as follows:
- 2,360 cases;
 - 3,434 seizures;
 - 365,728,692 pieces (medicines, vaccines and medical supplies); and
 - 83 reporting Members.
29. The Operation report was launched on 7 December 2021 during a virtual event with nearly 200 participants under the patronage of the WCO Secretary General; OLAF Director-General; Vice-Chair for the WCO West and Central Africa (WCA) region; Director General of Japan's Customs and Tariff Bureau; and Comptroller-General of Nigeria Customs Service.
30. The full Operation STOP II report, offering a detailed analysis of the outcomes, may be consulted on WCO Members' website (restricted access).

• **Follow up**

31. As the COVID-19 pandemic rolls on, the WCO will continue to monitor the situation closely.
32. In light of the Policy Commission's guidance, and as the COVID-19 pandemic remains ongoing, the WCO will launch phase 3 of Operation STOP II in April 2022.
33. With the recent approval of some medicines for the treatment of COVID-19 and to equip Customs officers with knowledge of detection methods, the WCO has re-launched its global webinar series with MSD (held on 16 and 17 December 2021), Pfizer (held on 18 and 19 January 2022) and Novavax (held on 19 February 2022).
34. To build up the pool of WCO Technical and Operational Advisors (TOAs) on Intellectual Property Rights (IPR), two (2) accreditation workshops were organized in January 2021 in Togo (for French speakers) and in February 2021 in Mexico (for Spanish speakers).
35. In December 2021, reminder letters were sent to any remaining Members not yet having confirmed their participation in phase 3 of Operation STOP II. As of 22 February 2022, STOP II currently has 158 participating Members.

III. Possible way forward

36. The COVID-19 Project will continue assisting the interested WCO Members during informal thematic meetings in analysing their existing Customs procedures, finalizing the SOPs and sharing the existing best practices. The Project team will deliver capacity-building activities at the regional and national levels: a regional workshop for Europe (May 2022) and three workshops will also be organized at the national level for Members having requested the Project's support, namely, Dominican Republic, Haiti and Tonga.
37. The STOP II project will continue delivering various capacity-building activities, updating the relevant tools and debriefing meetings with RILOs, Members and all other partners.

IV. Conclusion

38. The PTC is kindly invited to:
 - Take note of the progress on the implementation of the Council Resolution on the Role of Customs in Facilitating the Cross-Border Movement of Situationally Critical Medicines and Vaccines;
 - Examine and discuss the annexed Self-Assessment Checklist and if appropriate, endorse it;
 - Provide guidance on the way forward.

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April 2022

*WCO Guidelines on disaster
management and supply
chain continuity*

WCO COMPLIANCE AND FACILITATION DIRECTORATE
PROCEDURES AND FACILITATION SUB-DIRECTORATE

Self-Assessment check list to the WCO Guidelines on disaster management and supply chain continuity

In July 2020 the World Customs Organization (WCO) launched the WCO COVID-19 Project, an initiative financially supported by the Government of Japan to strengthen the capacity of Members' Customs Administrations in Developing and Least Developed Countries in addressing the challenges stemming from COVID-19, infectious diseases and natural disasters.

The Project developed the WCO Guidelines on disaster management and supply chain continuity with a view to serving three main objectives:

- raising awareness of the crucial role that Customs administrations play in disaster relief and supporting Customs administrations in implementing the provisions of other related WCO instruments and tools;
- supporting Customs administrations in enhancing their level of preparedness to respond efficiently and effectively to pandemics and natural disasters; and
- providing Customs administrations with clear recommendations supported by best practices to address the challenges stemming from infectious diseases and natural disasters, so as to expedite the movement of relief goods and ensure supply chain continuity.

To assist Customs administrations in evaluating their conformity with the WCO Guidelines on disaster management and supply chain continuity, the present Self-Assessment Checklist is developed.. It covers several elements relevant the following areas:

- Organization and roles
- Legal Framework
- Resources
- People
- Cooperation
- Procedures and measures

The Checklist will enable Customs administrations to better evaluate:

- their capacity to ensure the expedited movement of relief consignments in case of natural disasters and similar events;
- their preparedness and ability to ensure the continuity of their operations in the aftermath of a disaster;

- potential needs and gaps to be filled in relation to the existing legal framework, capacity-building, use of technology, modernization of procedures and processes, etc.

The main objective of the self-assessment checklist is to help Customs administrations in identifying areas where more modernization and reform effort should be deployed and to better direct their technical assistance and capacity building requests.

All questions allow the inclusion of additional comments and observations and should be answered with reference to the COVID-19 pandemic and similar disruptive events such as natural disasters.

<u>Self-Assessment checklist</u>			
1. Organization and roles	Yes	No	Comments/Observations
1.1. Is there an authority in charge of disaster management in the country?			
1.2. Is the Customs administration cooperating closely with this authority?			
1.3. Is the role of Customs reflected in the national emergency response plan?			
1.4. Is there a unit at the Headquarters level mainly responsible of the overall management (including setting up procedures, coordinating with relevant stakeholder, etc.) of emergency situations?			
1.5. Is there a unit, within your administration, mainly responsible to manage communication on the response to pandemics, infectious diseases and other disasters?			
1.6. Does your administration make the appropriate legislation, new measures and Standard Operating Procedures (SOPs) available to key stakeholders and the general public? Which communication channels are used?			
1.7. Does the Customs administration have an established Business continuity plan to ensure the continuity of operations in case of emergency?			

2. Legal Framework			
2.1. Does the national legal framework include provisions for natural disaster management?			
2.2. Does the Customs legislation include specific provisions related to importation of relief goods in case of disasters, e.g. waiving of Customs duties and/or specific procedures for relief consignments processing, etc.?			
2.3. Does the administration implement specific procedures to respond to disruptive events?			
2.4. Is the country a Contracting Party to the International Convention on the simplification and harmonization of Customs procedures known as the Revised Kyoto Convention?			
2.5. Are Customs procedures aligned with Chapter 5 of Specific Annex J to the Revised Kyoto Convention on relief consignments and its guidelines?			
2.6. Is the country a contracting party to the Istanbul Convention on temporary admission?			
2.7. Are the provisions of Annex B.9 to the Istanbul Convention on temporary admission included in the national legislation?			
2.8. Did the administration implement the WCO Council 2011 Resolution on role of Customs in disaster relief? What's the state of play in implementing this Resolution?			

<p>2.9. Did the administration draft Standard Operating Procedures (SOPs) based on national legislation, for the processing of relief consignments in case of disruptive events such as infectious diseases and natural disasters?</p>			
<p>2.10. Did your administration implement other WCO tools relevant to the context of disaster management such as the SAFE Framework of Standards, etc.</p>			
<p>2.11. Did the country ratify the World Trade Organization Trade Facilitation Agreement and implement its provisions?</p>			
<p>2.12. Did the country adhere to international conventions relevant to the disaster relief area such as the Tampere convention on the provision of telecommunication resources for disaster mitigation and relief operations?</p>			
<p>3. Resources</p>			
<p>3.1. Does the administration have a Customs clearance automated system?</p>			
<p>3.2. Does the Customs automated system contain a specific module for the processing of relief goods?</p>			
<p>3.3. Does the country have a national electronic single window in place?</p>			
<p>3.4. Does the administration have an Emergency Operations Centre (EOC) to be activated during the response phase?</p>			

<p>3.5. Does the administration have a rapidly deployed emergency infrastructure to allow Customs to continue operations under safe conditions in the event of a pandemic or the destruction of Customs clearance infrastructure by a natural disaster?</p>			
<p>3.6. Does the administration have a Risk management system in place that allows to limit the physical inspection to the high risk shipments?</p>			
<p>3.7. Does the administration have/ use non-intrusive inspection equipment and techniques?</p>			
<p>3.8. Does the Customs administration have an established Post-clearance Audit Unit?</p>			
<p>4. People</p>			
<p>4.1. Does the Customs training curriculum contain modules related to disaster management?</p>			
<p>4.2. Are the management team Members of the administration benefiting of training on leadership in time of crisis?</p>			
<p>4.3. Is Customs staff working at points of entry receiving (or have they received) capacity-building support concerning the implementation of procedures to respond to pandemics, infectious diseases and other disasters?</p>			
<p>4.4. Is the administration carrying out simulation exercises with other stakeholders to enhance the operational readiness of its staff?</p>			

<p>4.5. Are specific measures envisaged and/or tools provided to ensure the safety of Customs staff? Consider the following examples and add more if applicable: working shifts, PPE, etc.</p>			
<p>4.6. What are the main work arrangements to be implemented in case of disruptive events? (E.g. remote working, etc.)</p>			
<p>4.7. Is Customs staff receiving training on the latest technology available to modernize Customs processes and procedures?</p>			
<p>5. Cooperation</p>			
<p>5.1. What are the other relevant Government agencies that are involved in the clearance of relief goods?</p>			
<p>5.2. Is the Customs administration cooperating closely with the other governmental agencies involved in the importation and regularization of relief goods?</p>			
<p>5.3. Is the administration collaborating sufficiently with other Customs administrations?</p>			
<p>5.4. Is the Customs administration collaborating with the private sector? What are the mechanisms of this collaboration?</p>			
<p>5.5. Does the Customs administration have an Authorized Economic Operator or similar programmes?</p>			
<p>6. Customs procedures and measures</p>	<p>Yes</p>	<p>No</p>	<p>Comments/Observations</p>

<p>6.1. Does the Customs administration accept simplified and provisional forms of declarations subject to regularization within a specified period?</p>			
<p>6.2. Does the Customs administration accept the electronic form of declarations and supporting documents?</p>			
<p>6.3. Is the Customs administration fostering the use of risk management, pre-arrival processing and immediate release to ensure the expedited release of relief and essential goods?</p>			
<p>6.4. Does the Customs administration limit the physical inspection of relief goods and optimize the use of non-intrusive inspection techniques and, if deemed necessary, prioritize the inspection of relief and essential goods?</p>			
<p>6.5. Does your administration have appropriate means to implement Customs duties exemption, payment deferral, and waiving fees to support traders who are impacted by the disruptive event?</p>			
<p>6.6. Does the Customs administration proceed to the examination and/or sampling of goods only in exceptional circumstances?</p>			
<p>6.7. Does the Customs administration have alternative procedures to be implemented in case of disruption to the computerized system (e.g. power outage)?</p>			
<p>6.8. Is the Customs administration</p>			

<p>using new technologies to minimize physical contact with Customs personnel and facilitate the control and clearance of passengers?</p>			
<p>6.9. Does the administration allow the extension of temporary admission in case of difficulties to re-export the goods?</p>			
<p>6.10. Does the administration implement facilitative measures to assist the transit of goods?</p>			
<p>6.11. Is the administration carrying out an assessment of the measures implemented during the response phase?</p>			
<p>6.12. Are the measures that have proven to be effective in improving Customs procedures being sustained by specific actions, such as the adaptation of the national legislative and institutional framework?</p>			
