

# COVID-19 Vaccine Distribution Efforts World Wide

## *Responses from Some IFCBA Members*

## Responses from Some IFCBA Members on Managing COVID Vaccines: “In Their Own Words”

<b>1. Any impediments to vaccine production and distribution that you have experienced or perceived as a possibility because of trade policies and/or customs practices;</b>	
<b>Country</b>	<b>Response</b>
Australia	In Australia, we are experiencing local production issues of the AstraZeneca vaccine and there seems to be a logistical issue as well. Communication from Government is clouded and no real common approach as each State of Australia is conducting its rollout. No customs regulatory issues with imported vaccines. There have been issues with imported vaccines with the EU cancelling around 500,000 doses claiming it is required for domestic purposes. With Australia COVID free status for over 45 days, I can only assume the EU is placing more need locally.
Canada	Not to our knowledge. CBSA and participating agencies have been very proactive and available on sensitive products in general, such as vaccines.
China	The current trade policies and customs practices of China would not cause any difficulties in the production and distribution processes of the Covid Vaccine. Under the current situation, Chinese vaccines are continuously flowing to the other countries, contributing to global anti-epidemic work.
India	Seamless supply chain movement of vaccines.
Italy	No impediments for production or distribution of vaccine except shortage in supplying Pfizer vaccine probably because of trade policies not customs practices.
Japan	No impediments – customs clearance procedures are being carried out smoothly.
Malawi	On the logistics side, this is where Malawi seems not to have proper infrastructure and internal connectivity to facilitate swift transportation and distribution of the Covid vaccines.

	<p>The impediments also include lack of cold chain capacity storage, cold chain transportation to destination centres, electricity unavailability in most remote areas. Most of the road network is also in bad shape coming from the rainy season that is going towards the end.</p> <p>Generally and in conclusion, it is the low turn up to get the jab that we see as the biggest challenge since the biggest part of the population believes that the covid -19 is just another common flu.</p>
Thailand	<p>In Thailand currently, the importation of COVID vaccine is still under a government agency, which has assigned the FDA to be the main agency for managing licensing and controlling. The state is still the only one importer to distribute vaccines to General public. Therefore, the importation of this COVID vaccines would not be impediment at all.</p>
United States	<p>None. The US federal regulating agencies cooperated with each other and issued emergency procedures to facilitate the importation of research and development materials used for vaccine development. Customs and Border Protection and other regulating agencies were very responsive to importer needs removing logistical constraints to facilitate the importations.</p>
Uruguay	<p>Uruguay does not produce this vaccines so the Customs role in facilitating procedures along with the Ministry of Finance an Economy was really important. For that in particular you may find every measure taken in the link <a href="https://www.aduanas.gub.uy/innovaportal/v/22738/1/innova.front/acciones-coronavirus.html">https://www.aduanas.gub.uy/innovaportal/v/22738/1/innova.front/acciones-coronavirus.html</a></p>
<p><b>2. Any good practices on trade's role in ensuring the smooth cross-border movement of goods and people that you observed in your business or your country; and</b></p>	
<b>Country</b>	<b>Response</b>
Australia	<p>Australia is basing itself to be self-reliant on the production of the AstraZeneca it is well behind in its original targets for vaccinations. The sentiment is that the government became complacent as COVID infections have been very low in the last 7 months to the point where one locally acquired infection is detected a mass media coverage</p>

	<p>occurs. On what imported vaccine we have received the international leg has performed well and no impediments have occurred.</p>
Canada	<p>Effective communication between all parties involved in the delivery is crucial. Insuring that all stakeholders are involved throughout the transportation and entry process to avoid any miscommunication that could result in shipment delays.</p> <p>Appropriate prior-notice timeframe need to be given to all stakeholders, including all required documents and authorizations from participating government agencies, is essential.</p> <p>24-hour access to the importer’s primary contacts at all stages is key, from the shipment departure up to final destination delivery, especially for time sensitive, highly perishable products or potentially dangerous products.</p>
China	<p>In the step of trade practice, we can share some good experiences of our country:</p> <ol style="list-style-type: none"> <li>1) The Chinese government is doing a good job in epidemic prevention and control at all ports of entry, including nucleic acid testing and the necessary 14-day quarantine.</li> <li>2) Printing and distributing technical guidelines for the prevention and control of Covid-19 in the operation of cold chain food, and the notice of Technical Guidelines for the Prevention, Control and Disinfection of Covid-19 in the Production and Operation Process of Cold Chain Food.</li> <li>3) For front-line customs operators, the customs has also formulated strict protective measures and operating methods.</li> </ol> <p>It is precisely because of the formulation and implementation of the above measures that the smooth cross-border movement of people and goods in the trade is ensured.</p>
India	<p>We would like to inform you that The CBIC (Central Board on Indirect Taxes &amp; Customs) – Customs Board (Government of India) had taken utmost proactive initiatives in drafting policy and issued trade notices for seamless supply chain movement of Vaccines and other covid related material which has been well experienced by trade and seems no issues.</p>

	 <b>Covid Facilitation</b> <b>Circular-No-56-2020</b>
Italy	Confirm smooth cross border movement of goods but not people because many obstacles from neighboring countries.
Japan	At present, customs clearance procedures and logistics are being carried out smoothly in Japan, and we understand that no particular problems (obstacles) have arisen. Japan Customs Brokers Association will continue to cooperate to the maximum extent possible with the relevant government agencies, and related organizations/companies within the international framework of COVAX, etc., and as an essential worker, will strive to ensure appropriate and prompt customs clearance procedures as well as safety and security.
Malawi	<p>The Malawian scenario is centred mostly on the logistics since we are not involved in the production. Nevertheless the Malawian customs and trade policies necessitated a very smooth landing of the ASTRA ZANECCA vaccine. The first batch was transported by air thereby not affected by cross border issues.</p> <p>The duty waiver processes and customs clearance were all well supported by the authorities in government and the private sector.</p>
Thailand	<p>Since the state is the only importer and still does not grant any private sector to be able to import at this time being. The reason is that the government wants good control to ensure that COVID vaccines import by the private sector according to regulations and safe for the public.</p> <p>Recently, the government has granted permission for private sector who wish to import the COVID vaccine can apply or register as an importer, and all must comply with the rules and regulations set by the government, which the FDA is the agency that assesses the qualifications and approval, the time within 30 days.</p>
United States	As US Customs organizes entry review around industries into Centers of Excellence and Expertise, there was a pre-established communication channel for all vaccine related importers and importations. Also, having been previously organized by industry, the team educated and experienced with pharmaceutical importations was prepared. Importers were able to deal with known CBP personnel.

Uruguay	As for Uruguay the Ministry of Public Health handled institutionally every detail related to either the negotiation of the vaccines, the importation process and the distribution. The private sector had a key role in the smoothness of every coordination required (some enterprises even decided to intervene and collaborate free of charge on what was required: ie Cargo Terminals, etc.).
<b>3. Any suggestions for international organizations or multilateral arrangements in this regard.</b>	
<b>Country</b>	<b>Response</b>
Australia	I feel that the International logistics supply chain has been ready for some time in the rollout of the vaccines, it is when politics become involved that delays occur in the rollout.
Italy	Improving smooth cross-border formalities.
Thailand	(commentary) Thailand has a population of about 65 million. If about 15 million teenagers were subtracted from the sum, the number of those eligible for vaccines would be about 50 million, plus another five million foreign migrants, with a calculation based on 80% of the 55 million people, about 40 million would receive two jabs of vaccines each which would require about 80 million doses. There are only two COVID vaccines that the Thai government is importing currently SINOVACC and AstraZeneca.
United States	The facilitation of research and development goods was not as smooth into other countries, notably Europe. Existing regulatory requirements, while suitable for normal activity, were not altered to accommodate the dire global situation. In the USA, the federal Food and Drug Administration was able to invoke emergency use authorizations temporarily waiving or reducing import requirements.
Uruguay	As a suggestion we humbly think that having a strong collaboration between the public – private sector is the best way to a joint approach in this matter.

*Consolidated Comments: WCO PSCG Call for  
Input on COVID-19 Impact (DRAFT)*

## TRADE AND INVESTMENT

### Commission on Customs and Trade Facilitation

#### Consolidated Comments: WCO PSCG Call for Input on COVID-19 Impact (DRAFT)

<b>1.) Any impediments to vaccine production and distribution that they have experienced or perceived as possibility because of trade policies and/or customs practices?</b>	
<b>Country</b>	<b>Comments</b>
Greece	Have not perceived any impediments, only slow procedure of distribution to hospitals; not because of trade policies but because of transnational agreements.
South Africa	<p>The current supply chain for production and distribution of vaccines include a number of obstacles from a trade policy and customs perspective. South Africa has received approval for the production of one of the vaccines for local and worldwide distribution, but the current trade policy and customs framework has not been adjusted to accommodate the special requirements that needs to be in place for the movement of this sensitive and precious cargo.</p> <p>The certificate of origin process remains a manual process which is extremely slow and adds at minimum 2 days to the supply chain process. The special permits that need to be issued for the distribution of the goods are spread out over a number of government departments with most of the processes being manual activities and multiple applications to be made to various departments</p> <p>No prioritisation has been given to the movement of the cargo from a custom declaration and manifesting process e.g. simplified clearing or post clearing as examples. Green lanes for</p>

	<p>the distribution of the vaccines have not been set up across the continent.</p> <p>Varied regulations in the different countries makes the movement and declaration process cumbersome and slow as a single agreement between the various regions and across the continent on the treatment of the movement and storage of the vaccines has not been set up</p> <p>Storage requirements for the vaccines differ from country to country and from vaccine type to vaccine type. No skills and capacity building for the treatment of the vaccines from a customs and other government agency point of view has been provided across the continent</p> <p>Each region has implemented different protocols without holistic alignment between regions; this could be addressed on AU (African Union) level. The role of AcFTA (African Continental Free Trade Area) in allowing vaccines to fall under preferential goods exists, but has not been agreed</p>
Switzerland	Use and threat of export restrictions on vaccines (e.g. EU); discussion on localisation of production; growing protectionism. All trade restrictive measures must be temporary, proportionate and used only as a last resort.
<b>2.) Any good practices on the role of trade in ensuring the smooth cross-border movement of goods and people that they observed in their industries or countries?</b>	
<b>Country</b>	<b>Comments</b>
Greece	Cross border movements run smoothly but slowly due to corona prevention measures to people involved.

<p>South Africa</p>	<p>Trade collaboration and engagement has been very good and joint task teams have been established in most countries between industry and some of the statutory bodies on a strategic level.</p> <p>It is however on the operational level that execution aspects and details have been neglected and communication and engagement has not been sufficient.</p> <p>If strategic engagement approach could be filtered down to operational level and intergovernmental alignment and approach could be improved among customs, health and transport, substantial trade flow improvements could be achieved.</p> <p>It is important that information and requirements are made available as quickly, clearly and online as possible to address all aspects relating to the vaccine requirements. It is critical that these requirements are consistently applied across all governmental agencies. There are often conflicting rules left open for interpretation resulting in costly delays and disruption in the distribution process.</p>
<p>Switzerland</p>	<p>Acceleration of the border crossing of goods through priority lanes (green lanes) for certain goods that serve the country's supply (e.g. as food or medical goods) and temporary suspension of duties for medical goods. Trade and global supply chains can only function if free flow of goods and people are guaranteed. Any border restrictions hamper the fight against the virus.</p>

Ukraine	<p>Greater support and involvement from the whole supply chain and particularly PortCommunity Systems and Single Windows are critical for smooth cross-border movement of goods, trade continuity and providing the resilience to carry on trading, while keeping borders safe and secure.</p> <p>Port Community Information System operator collaborated with the Ukrainian Seaports Authority, Odessa Seaport, sea terminals to reduce the number of paperwork and documents, as well as to avoid direct contact, through interoperability of IT systems of different stakeholders processes.</p> <p>The existing functionality, such as 'free practice', when all border control agencies assess risks to allow vessels to moor and begin loading and unloading operations has been expanded with new modules.</p> <p>Gate entry queuing and remote order for tracks and cars to enter the port, to minimise the likelihood of peak loads, and to prevent congestion at the port gates and adjacent city streets.</p> <p>Remote electronic registration and transmission of QR based pass directly to the driver's mobile device to enter the port via security gates without additional person-to-person contacts;</p> <p>Informing customers about the status of their documents and consignments, messaging on permission of the Customs authorities to release a transport, and vessels departure from the port for all stakeholders in the electronic form, etc.</p>
<b>3.) Any suggestions for international organizations/ multilateral system in this respect?</b>	
<b>Country</b>	<b>Comments</b>
Germany	<p>Need for the WTO Pharma Agreement to be extended. It would be thus important to urge all WTO members to join the ongoing negotiations that started in mid-2020 for a global health agreement against barriers to trade in this area. This should be the priority for the upcoming 12th WTO Ministerial Conference this December, WCO urged to support this.</p>

South Africa	<p>Trade Facilitation policies and procedures e.g. certificates of origin should be either exempt or done on a post clearance basis.</p> <p>Establish skills and capacity building programmes through online courses and enablement for traders and customs brokers, including Guides and best practice to be developed on distribution and storage.</p> <p>Regional co-ordination and harmonisation for free vaccine movement, and AcFTA to be mobilised and utilised, AU to push for adoption across continent</p>
Switzerland	<p>Highest possible transparency of supply and demand of critical goods through prompt and comprehensive exchange of information, nationally, internationally, within and between business and politics. Uncertainty fuels protectionist trade policies (e.g. export restrictions).</p> <p>Global challenges such as COVID-19 require globally coordinated solutions, i.e. most far-reaching possible obligation under international law to restrict exports of goods that are critical in the event of an epidemic (e.g. vaccines, food, medicines, PPE) to combat COVID-19.</p> <p>The discussions on the health care products initiative shall be intensified in the WTO, generally strengthening and modernisation of the WTO is needed.</p>
Ukraine	<p>On the basis of the outcomes and recommendations of the 9th and 10th International seminars held in Odessa, Ukraine in 2019/ 2020 and to support the development of digital multimodal transport corridors to increase harmonisation and standardisation of data exchange in international transport, trade and logistics, and to encourage electronic data exchange and thereby reduce person-to-person contacts during COVID-19 and in the post-pandemic recovery, using relevant UN/CEFACT standards, Ukrainian experts have conducted a Study on the Standardised Dataset Aligned to International Standards and Data Models and Document Implementation Prototypes for Use in Eastern Europe.</p>

**+ General points from the United States Council for International Business (USCIB) Customs and Trade Facilitation COVID-19 Priorities (2020)**

**applicable here:**

Countries should remain dedicated to open trade and supply chains for COVID-19 vital goods. Countries are strongly encouraged to not implement formal or informal, de facto, trade restrictions on any goods, but in particular those vital goods deemed critical or essential. If such measures are put in place, they should only be temporary in nature.

There is a need for continued development of international guidance, noting the respective mandates of international organizations, to assist governments in prioritizing trade in goods essential to fighting COVID-19 and protecting economic resiliency.

With respect to critical supplies, where we consider vaccines, vaccines inputs, other medical supplies and equipment, customs authorities should work with other agencies at the domestic level to ensure or continue to ensure the highest level of trade facilitation is afforded to provide expedited movement of these goods.

Customs administrations need to continue strong, clear, Customs – trade stakeholder dialogue and communications. We recommend ongoing engagement, in virtual environment, between trade stakeholders and custom administrations to support timely information sharing on border measures that impact the movement of people and cargo at ports of entry and border crossings.

Illicit trade including counterfeit and fake products continue to be a challenge in the COVID-19 environment. This issue of COVID and impacts to illicit trade are being discussed in great detail at the OECD as well as at the WCO, for example, within the respective remits of the organizations. Countries should be encouraged to avoid import bans on goods deemed to be non-essential.

While prioritization should be given to vital goods, countries should be encouraged to continue to facilitate trade in all COVID-19 related goods where possible in line with, as appropriate, WCO and/or WTO guidance.

*ESA's response to the importation and distribution of COVID-19 vaccines*

# ESA's response to the importation and distribution of COVID-19 vaccines

## **CONTENT**

This document contains a collective response from the ESA region on impediments to vaccine production and distribution. The vaccine rollout has been slow throughout the region because of cross-border constraints. Nonetheless, there is some silver lining in an otherwise dark sky and the private sector shares these experiences - notably that of South Africa.

There have been positive trial results from the major vaccine developers around the world. Our collective fight against COVID-19 continues as the ESA Region ensures the safe transport and distribution of the precious cargo. The situation, however, can be improved through suggestions are presented in this document. The content of this document is as follows: **(1)** Existing impediments, **(2)** Case Study on South Africa, and **(3)** Recommendations for the successful production and distribution of vaccines in the ESA region.

### **Existing impediments**

Many existing customs and cross-border trade constraints still inhibit the smooth flow of regional trade throughout the region. Indeed, several non-tariff barriers (NTBs) remain. Unfortunately, many of these cargo movements have been further restricted by implementing more stringent pandemic health regulations. A significant constraint has been the disharmony of policies and procedures implemented throughout the region. In addition, government agencies' communications in the respective countries have not always correlated with each other. The official communications of Health services and other OGAs are also lacking or problematic. As trade within the ESA region (and indeed globally) is continuous, official communications must reach corridor users before departure of trucks from the point of origin.

## **Case Study on South Africa: The development of a SOP**

### **Development**

In collaboration with the extended South African supply chain operators, the private sector collectively developed a standard operating procedure (SOP) to provide a detailed breakdown of the import process for COVID-19 vaccines from origin to the point of arrival in South Africa.

This consolidated approach became necessary because of the lessons learnt during the importation and distribution of personal protective equipment (PPE) shortly after the first lockdown was instituted. At the time, no special consideration was given to the import process and which was regarded as the typical run of the mill. The pressure and panic caused by the pandemic and strict requirements for PPEs resulted in opportunities for unscrupulous dealings due to processes not being as secure as they should have been

The SOP was developed through a collaborative effort involving a number of key stakeholders. These included the necessary regulatory authorities, customs administration and other governmental agencies as well as key role players from the private sector.

The SOP aimed to:

- Identify all the role players and their specific involvement within the supply chain;
- Provide a clear differentiation between the responsibilities of the various role-players;
- Provide an outline of various areas of concern and considerations which must be clarified to achieve a successful vaccination rollout strategy.

The SOP included all the prerequisites for engaging in the import transaction of medical goods as per international best practices.

### **The buy-in from all stakeholders**

Since time was of the essence, a collective buy-in was required from all stakeholders. Consequently, the successful development showcased an impressive example of a public-private partnership. In total, twelve different associations provided the necessary input to create the SOP. These included the South African Revenue Authority (SARS) Customs and Excise as the lead administration in facilitating trade in South Africa and the South African Health Products Regulatory Authority (SAHPRA) for licensing and approval requirements for the importation of medical goods. The process was overseen by the National Department of Health which is responsible for the procurement and administering of the vaccines.

Since the vaccines are imported via airfreight, there was significant focus on the air-cargo industry's workings which required the buy-in from the Airports Company South Africa (ACSA) and the South African Civil Aviation Authority (SACAA).

### **The testing of the SOP**

The SOP was ready for testing just before South Africa received its first shipment of the vaccine. The first cargo load allowed all SOP facets to be stress-tested and scrutinised under a microscope and any shortcomings were worked into the document to ensure that the technical writings reflected the commercial realities on the ground.

Handlers of COVID-19 vaccines prioritised and coordinated the offloading of aircraft and removal process to the allocated transit sheds as a matter of priority. The designated airport authority, ACSA, handlers and all role-players involved, ensured that the removals of vaccines were conducted under strict physical escort and monitoring from the point of offloading from aircraft to allocated transit sheds. Offloading of vaccines was prioritised and accounted for at the point of offloading. Any detection of deviations (including such as pilferage or damages) was monitored. Due to the vaccine's nature, the cold chain's integrity had always to be kept intact.

### **The adoption of the SOP and further development**

The SOP has been welcomed and adopted by all industry role-players, both public and private. At present, the development of a Transshipment and Export SOP is underway, as the Southern African Development Community (SADC) indicated a willingness also to adopt this strategy.

## **Recommendations**

The collective ESA Region would like to make the following suggestions for international organisations or multilateral systems regarding the fight against the pandemic and the hopefully smooth production and distribution of the vaccines.

### **1. Sound practice principles and guidelines are essential to ensure reliable, safe, and expeditious access to vaccines.**

- a. Since we can expect procurement from different sources, it is essential to consider possible challenges related to these other supply chains' integrity and security. Therefore, it is suggested to consider specific *ad hoc* cooperation with the relevant agencies (customs, health, and OGAs) in the source countries to support expeditious access to vaccines under safe and secure supply chains.

### **2. Establish uniformity in terms of cross-border operating procedures.**

- a. Various regulations remain country-specific.
- b. A notable case in point is the requirement of PCR/antigen tests for truck drivers when crossing the borders. Collectively, the ESA promotes the use of antigen tests due to their rapid nature.
- c. Nevertheless, there should be a reliance on the PCR/antigen tests and a mutual recognition of these tests between the respective transit countries. Furthermore, there needs to be consistency in the number of days which tests are valid, since the concessions throughout the regions range from 7 to 30 days. These tests add high additional costs (as much as ~\$120 for some) for transporters.

### **3. Consider the issuing of vaccine passports.**

- a. And their accompanying mutual recognition.
  - i. Currently implemented in Zimbabwe. Request documentary proof

**4. Resolve existing and newly lodged NTBs via an escalation mechanism.**

- a. As mentioned above, several NTBs still inhibit regional trade daily. Consequently, there is a plea from the private sector to speed up the resolution of these NTBs, since this will also greatly assist with distributing vaccines across the region.

**5. Establish a monitoring mechanism ensuring transparency and end-to-end visibility of vaccine distribution in the ESA region.**

- a. Establish a mechanism to combat corruption, malpractice and provide a collaborative region fight against the virus. A transparent monitoring system will always ensure compliance.
- b. Corruption remains a pitfall in several countries as was experienced with the distribution of personal protective equipment earlier in the pandemic.

**6. Create a Public-Private-Partnership (PPP) collaboration that aims to digitalise the import and export compliance activities in the regional supply chain cargo movements.**

- a. In some countries, their Customs Authorities are well capacitated to function on an IT-based communication system, whereas their OGAs are not.
- b. Since some OGAs' operating platform – which differs from Customs as they have different requirements pertaining to, for example, vaccines and or other medical conditions – are not yet as advanced and often conducted on a manual basis.

**7. Provide official communication via existing platforms.**

- a. Whether done through SADC, COMESA, or the WCO ESA, there needs to be an official communications platform and the communication should be disseminated to the government agencies as well.
- b. It is paramount that communication reaches corridor users before the departure of trucks from the point of origin.

## **Conclusion**

This document contains a collective response from the ESA region on impediments to vaccine production and distribution. Even though the vaccine rollout has been slow and uneven throughout the region, we can ensure a successful fight against the pandemic with a collective response.

Now is time to migrate to a regional focus to ensure bringing some much-needed relief to the region and the African continent. As outlined in the recommendations in this document, bold steps must now be taken to address the situation. Ultimately, the prospects for 2021 and beyond are uncertain due to uneven vaccine distribution worldwide and the potential emergence of new variants of COVID-19. Nevertheless, the message remains the same for our regional supply chain. For our part, we must continue to work in the faith that the East and Southern African supply chain and greater trading community remain robust and resilient.

*Comments Contributed By Huawei*

## Comments Contributed By Huawei

Dear John and other colleagues,

For WCO Secretary General Kunio Mikuriya tend to gain the input from the group's membership on the impact of COVID-19, specifically on the 3 following issues , there are some policies and measures (*Blue font*) in China that I can share for your reference, and some suggestion as well:

1. Q: Any impediments to vaccine production and distribution that they have experienced or perceived as possibility because of trade policies and/or customs practices;

***A: First of all, China has not imposed restrictions on the export of epidemic prevention materials. Second, China had strengthen quality control, regulate the export market order, provide qualified epidemic prevention materials to the international market, and actively support countries in the fight against the epidemic. Please find some details as follow:***

*On April 25, 2020, China's Ministry of Commerce (MOFCOM), the General Administration of Customs (Customs), and the State Administration for Market Regulation (SAMR) jointly issued the Announcement on Further Strengthening Quality Oversight for Exported Pandemic Prevention and Control Supplies (English translation). The announcement eases a previous restriction that required medical supplies needed for pandemic control—COVID-19 testing kits, medical masks, personal protective equipment, ventilators, and infrared thermometers—to obtain Chinese medical device registration certifications before being exported. Effective April 26, 2020, the specified pandemic control supplies can be exported if they have obtained foreign certifications or registrations that are accepted by the importing countries.*

*Previously, following foreign complaints—mainly from European countries—that some Chinese virus test kits, masks, and other products did not meet quality standards, Chinese authorities ordered that exporters of the specified pandemic control supplies must provide a declaration certifying that their products had been*

*duly registered in China and conformed to the importing country's quality standards. (MOFCOM, Customs, and National Medical Products Administration, Announcement on Orderly Operation of Medical Supply Export Business, Mar. 31, 2020, effective Apr. 1, 2020.) Under this announcement, Chinese Customs must verify the products' Chinese medical device registration certifications before releasing the exports.*

*The March 31 announcement was followed by a Customs announcement issued on April 10, 2020, that subjected 11 types of medical supplies—medical masks, medical protective suits, infrared thermometers, ventilators, surgical caps, medical goggles, medical gloves, medical shoe covers, patient monitors, medical disinfection wipes, and medical disinfectants—to statutory inspection.*

*According to the April 25 announcement, the MOFCOM would provide a list of medical device and supplies companies that have been confirmed by the MOFCOM to have obtained foreign certifications or registrations ("MOFCOM white list"). The MOFCOM white list is published and updated on the website of the China Chamber of Commerce for Import and Export of Medicines and Health Products. Before releasing the exports, Customs is required to verify if the manufacturer is on the MOFCOM white list.*

*The new announcement also requires that non-medical masks for export meet either Chinese or foreign standards. MOFCOM maintains another white list of non-medical masks manufacturers that have obtained foreign authentications or registrations. Non-medical masks that the SAMR has found to be substandard are prohibited for export. The exporter and importer of non-medical masks must make a joint declaration confirming that (1) the masks meet Chinese or foreign standards, (2) the importer accepts the standards, and (3) the masks won't be used for medical purposes.*

2 . Q: Any good practices on the role of trade in ensuring the smooth cross-border movement of goods and people that they observed in their industries or countries;

**A : Facilitation measures**

- ***Consignors and consignees are allowed not to show up on customs on-side inspections.***
- ***Extension of customs timeline for consolidated filing, duty payment, etc. Simplification of penalty procedure for epidemic prevention goods.***
- ***VAT exemption treatment on the revenue generated by affected industries and on qualified goods. Preferential import treatment of key commodities.***
- ***Fast clearance of donated supplies for tackling the novel coronavirus-related pneumonia;***

***Imposition of additional tariffs suspended***

- ***Temporary import exemption for goods donated in response to novel coronavirus***
- ***Additional tariff will not be imposed on US-origin imported goods for Coronavirus prevention purpose. For US-origin goods not covered, additional tariff applies, but companies can consider applying for the tariff exclusion process.***

***For some details as follow, firstly, China had released the GACC Announcement No.17 of 2020, in order to ensure the fast clearance of donated supplies for tackling the novel coronavirus-related pneumonia, the applicable customs formalities are hereby announced as follows in accordance with the Customs Law of the People's Republic of China and other related laws and regulations.***

- ***Green lanes have been set up at local customs districts to facilitate quick inspection and release of imported pharmaceuticals, disinfection***

*supplies, protective supplies, treatment equipment and other disease prevention and control related goods.*

- *In emergency situations, goods may be released upon registration followed by appropriate formalities. Medical supplies for the purpose of disease prevention and control , which require import medicine permits, may be released by Customs if there is a certificate issued by the medical competent authority, followed by appropriate formalities.*
- *In emergency situations, goods listed in the Interim Measures for the Exemption of Import Duties on Charitable Donated Materials (Announcement No. 102 [2015] of the Ministry of Finance, the General Administration of Customs and the State Administration of Taxation) may be released upon registration, followed by appropriate duty exemption procedures.*

***And plus, China also grant a temporary import exemption for goods donated in response to novel coronavirus***

*On 1 February 2020, China's Ministry of Finance, the General Administration of Customs, and the State Taxation Administration issued new rules (Bulletin 6) that grant a temporary exemption from import duty, value added tax (VAT), and consumption tax for specific goods donated to help prevent the further spread of the novel coronavirus and control the epidemic. The exemptions apply to donations of qualifying goods by foreign parties and by domestic parties that import goods from overseas or special domestic areas. Bulletin 6 applies for a three-month period from 1 January 2020 through 31 March 2020.*

***Exemptions***

*Certain goods donated by foreign parties (e.g., companies, individuals, NGOs, and governments) to national and local governments, qualified social organizations, and qualified charitable foundations are exempt from import duty, VAT, and consumption tax.*

*This exemption also is available for such goods donated by domestic parties in either of the following situations (but only if the goods are immediately put into use to prevent the further spread of the novel coronavirus and control the epidemic):*

- The goods were imported from overseas or special domestic areas under customs supervision (e.g., bonded zones); or*
- The goods were (or were made from materials) in a bonded status (i.e., subject to suspension of duty and import taxes) and donated by a domestic manufacturer who imported or manufactured the goods under a "processing trade relief" arrangement. "Processing trade relief" is a special regime that allows a domestic manufacturer to import materials in a bonded status to process into finished goods for export overseas; where the finished goods or materials subsequently are not exported but diverted for consumption in the domestic market, the duty and import taxes previously suspended would be reinstated if no exemption was granted.*

*The types of goods eligible for the exemption are expanded to include virus infection testing supplies, disinfection supplies, virus prevention supplies (e.g., protective devices/gear), and assistance vehicles (e.g., trucks providing disinfectant services, ambulances).*

*Provincial governments may add entities to their list of qualifying donees (such entities would be included on a list supplied by the provincial governments to the various customs offices). Where a donor does not identify a specific donee, the donee will be assumed to be one of the qualified national social organizations (e.g., the Red Cross Society of China) to ensure the exemption treatment.*

### **Other aspects of Bulletin 6**

- If import duty, VAT, and consumption tax were collected on goods entitled to the exemption, the importer can request a refund by submitting a refund application by 30 September 2020.*
- If an importer already has claimed import VAT as a credit against its output VAT, the importer only can obtain a refund of the import duty and consumption tax paid.*

- *In addition to the duty/tax exemptions granted by Bulletin 6, imports of affected goods may be "fast tracked" through customs provided the importer registers the basic information with the customs authorities and subsequently submits the full customs declaration at a later date.*
- *For US-origin goods subject to exemption under Bulletin 6, no additional retaliatory tariffs would be imposed. For such additional tariffs already collected on goods eligible for the exemption, a refund can be requested*

3. Q: Any suggestions for international organizations or the multilateral system in this respect.

***A: In my opinion, strengthen the global cooperation is very important and essential, and international organizations or the multilateral system (such as WCO,WTO,WHO and each government etc.) could coordinate and cooperate tightly, but there are still many challenges in this, in light of considering the health security, each government had to supervise the qualification or permit standard of epidemic prevention materials, including vaccine. So I think it is a crucial impediment to hinder vaccine cross-border movement and distribution smoothly, unless there are unified the criteria on a global level. And maybe international organizations consider to implement such as ATA Carnet similar measure as trade facilitation for epidemic prevention materials. Otherwise as general goods, it is hard to provide the trade facilitation measure for epidemic prevention materials.***

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