

**Lessons learned from Covid-19 Stress test:  
Filling the Gaps in Rules of Origin Provisions**

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**Type of Contribution:** Policy Brief

**Word count:** Highlight (229) and Text without references (2950)

**Keywords:** Rules of Origin (RoO), Paperless trade, Trade Facilitation, Free Trade Agreements (FTAs), COVID19

**A contribution to the Policy Hackathon on Model Provisions for Trade in Times of Crisis and Pandemic in Regional and other Trade Agreements**

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**Highlights:**

The 2020 pandemic “stress test” has been a true test not just for individuals but also for our supply chains, economic structures, and legal frameworks testing their resilience and agility. On reviewing the utility of existing preferential Rules of Origin (RoO) provisions within African and European FTAs and their readiness for crises times, the picture does not seem to be totally bleak. During this pandemic, some provisions, such as “*Submission of Proof of Origin*,” “Retroactive Issuance” and “Approved Exporter,” did work offering some facilitation in the submission phase. Others lagged behind, either due to their limited scope or due to regional difficulties in implementation and would need some tweaks to benefit economic operators not only during pandemics but in the business as usual situation.

Regional organizations and countries should work together towards:

- Taking agile steps to harmonization of E-certification of Origin on regional level.
- Developing territorial requirements chapters to guarantee cooperation among transit and landlocked developing countries in times of crises.
- Lodging Simplified Trade Regimes (STR) in new Free Trade Agreements (FTA) and introducing further relaxation for origin and customs documentation in the established STRs.
- Activating cumulation provisions through establishing regional joint projects manufacturing agricultural or essential medical supplies to serve as strategic reserves in times of crisis.
- Marketing of COVID information exchange platforms through diplomatic missions and national governmental websites to guarantee full access of economic operators.

## 1. Introduction

It probably hasn't been the finest hours for global trade. Before healing from a fierce trade war between two global economic powers, which raised many protectionist voices on the efficacy of liberalizing trade, it was knocked down by an unexpected global pandemic that has decreased global demand and spurred an appetite for nationalism and self-dependence.

According to the International Trade Center (ITC), 90 countries have been reported imposing various trade-restrictive measures, summing up to 195 global measures ranging from export licensing, export bans, and tariff increases.<sup>1</sup> Temporal suspension of contact between economic operators and customs authorities due to the COVID 19 and the downsizing in many relevant governmental entities have implied difficulties in “obtaining proofs of origin, necessary to claim benefits under an FTA.”<sup>2</sup> Furthermore, border restriction has severely affected informal cross border trade, especially for landlocked countries. In a continent like Africa, informal cross border trade accounts for up to 40% of intra-regional trade with women representing 70% to 80% in some countries.<sup>3</sup>

In such times, Free Trade Agreements (FTAs) were expected to provide privileges to trading partners through fostering interdependence, establishing regional supply chains, and relieving bureaucratic burdens for economic operators. Preferential Rules of Origin (ROO) chapters, which are one of the unarguably most important aspects of any unilateral/multilateral preferential trade arrangement in goods, have been rendered toothless with the increase in national restrictive policies, border controls, and nationalistic discourses of “reshoring of critical and strategic industries.”<sup>4</sup>

Clearly, this surge in beggar-thy-neighbor policies has exposed weaknesses in current global governance arrangements especially with regards to its inclusivity and agility.<sup>5</sup> The recurrence of epidemics in the last decade has hence confirmed the value of preparedness and the prominence of regular reviewing of regional and bilateral preferential rules to mitigate future crises.<sup>6</sup>

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<sup>1</sup> “Global Map of COVID-29 Temporary Trade Measures.” *International Trade Center*. Available at <https://www.macmap.org/en/covid19> [Accessed 25 June 2020]

<sup>2</sup> Johan Hollebeek and Raoul Ramautarsing, “*Claiming FTA Benefits in times of COVID-19: What to do if you cannot obtain an official origin certificate.*” (Deloitte, 4 May 2020) Available at: <https://www2.deloitte.com/nl/nl/pages/tax/articles/claiming-fta-benefits-in-times-of-covid-19.html> [Accessed 26 June 2020]

<sup>3</sup> Simonetta Zarrilli and Mariangela Linoci, “What future for women small-scale and informal cross-border traders when borders close?” UNCTAD, 8 May 2020. Available at: <https://unctad.org/en/pages/newsdetails.aspx?OriginalVersionID=2362> [Accessed 26 June 2020]

<sup>4</sup> Jan Orbie and Fredi De Ville, “*Impact of the corona crisis on EU trade policy: Our five cents to the debate.*” (Bruges: United Nations University Institute on Comparative Regional Integration Studies, 2020). Available at: <http://cris.unu.edu/impact-covid-19-crisis-eu-trade-policy> [Accessed 26 June 2020]

<sup>5</sup> Ngaire Woods, “Chapter 1: Planning for the World After COVID-19” In *Challenges and Opportunities in the Post-COVID-19 World*, World Economic Forum, 2020. Available [http://www3.weforum.org/docs/WEF\\_Challenges\\_and\\_Opportunities\\_Post\\_COVID\\_19.pdf](http://www3.weforum.org/docs/WEF_Challenges_and_Opportunities_Post_COVID_19.pdf) [Accessed 17 July 2020]

<sup>6</sup> Jared Diamond and Nathan Wolfe, “*Jared Diamond and Nathan Wolfe On the Value Of Preparation.*” (The Economist, 10 June 2020). Available at: <https://www.economist.com/by-invitation/2020/06/10/jared-diamond-and-nathan-wolfe-on-the-value-of-preparation> [Accessed 25 June 2020].

With a lens towards crisis preparedness, this paper aims to review the utility of existing ROO preferential provisions within African and European FTAs during the time of the pandemic in order to accurately pinpoint provisions where further development is needed. The first section of the paper will provide the initial screening for the challenges that have undermined the full benefit from rules of origin and trade facilitation provisions since the start of the pandemic based on an online questionnaire.<sup>7</sup> The second section provides evidence on which provisions were up to the COVID challenge and have facilitated trading and which ones could be further developed for better trade facilitation in times of crisis.

## 2. How does the trading scene looked like?

In the quest to further understand the effect of COVID-19 on the implementation of FTAs, especially with regards to RoO chapters, an online questionnaire has been carried out. A total of 101 women and men traders and governmental stakeholders have answered this questionnaire. Respondents to the survey were from different geographical areas with around 60% from Africa, 29% from Latin America, 8% from Asia, and 3% from Europe. The survey included questions comparing trading status before and after the pandemic, questions inquiring about the main challenges in trading during the pandemic, the most facilitating and challenging RoO provisions in application during the pandemic, and questions inquiring about the aspired facilitation needed by traders in FTAs.

Results shows no significant changes in the economic operator's FTA utility before and after the pandemic. Apparently, those who were already using them (46%) have kept using them even after the crisis. A majority of 57% agreed that FTAs represented a competitive advantage for companies in the face of national restrictive measures since the start of the pandemic. The result might seem surprising given that preferential tariff waiver was suspended on a number of goods due to national protective policies. However, referral here could be towards other goods and toward trade facilitation provisions in RoO protocols.

Respondents chose logistical challenges, decline in global demand and availability of information as the top challenges. They also chose provisions relevant to issuance and delivery of certificates of origin and transportation as the top challenging provisions in application during the pandemic with 37% and 22% respectively. 32% of respondents have also found flexibilities within these aforementioned provisions facilitating their trading since the start of pandemic along with national legislations that were issued separately from regional agreements.

There had been a tie concerning whether or not to provide more preferences to cross border traders; some has seen more preferences are needed (47.5%), others saw that the current provisions are enough and only further activation of these provisions are needed (46.5%).

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<sup>7</sup> Sara Ashour and Juan David, "The effect of COVID-19 on the implementation of Free Trade Agreements (FTA)." Questionnaire. 10 June 2020. Available at: [https://docs.google.com/forms/d/e/1FAIpQLSemC\\_4iYHz27nr8ntFb7JMZnC9pBC6c-C11Sb7gjEMx4fXaA/viewform](https://docs.google.com/forms/d/e/1FAIpQLSemC_4iYHz27nr8ntFb7JMZnC9pBC6c-C11Sb7gjEMx4fXaA/viewform)

### 3. Champion provisions: What did we do right?

Reflecting on the above results, the picture does not seem to be totally bleak. Responses show that some provisions did really work during the pandemic, albeit some provisions that needed some tweaks to benefit economic operators not only during pandemics but in the normal business as usual situations.

A relevant example is the flexibility provided in “*Submission of Proof of Origin*” provision within ROO protocols between EU and its Pan-Euro-Mediterranean contracting parties. This article states “*that proofs of origin shall be submitted to the customs authorities of the importing Contracting Party in accordance with the procedures applicable in that country.*”<sup>8</sup> Thus, by not specifying “a precise moment or form in which origin certificates have to be submitted to the customs authorities of the importing country,” it has allowed contracting members “to accept origin certificates in the form of a copy, whether issued on paper or electronically.”<sup>9</sup> Also, retroactive issuance provisions, which allows for exceptional issuance of certificates after exportation in the case of special circumstances without time limits, has offered further facilitation.<sup>10</sup>

Furthermore, many governments have encouraged their exporters to make use of “Approved Exporter” status, which allows exporters making frequent shipments under the agreements to self-issue an invoice declaration on any commercial document pledging their fulfillment to the origin requirement of the agreement.<sup>11</sup> This scheme, along with other schemes of Authorized Economic Operators (AEO), has been useful for traders with regards to speeding up clearance and release of critical non-medical goods.<sup>12</sup>

Some respondents have also praised the electronic systems for issuing proofs of origins adopted in many countries such as Kingdom of Saudi Arabia, United Arab Emirates, Turkey and Brazil, which provided a suitable solution given the suspension of contact between customs and exporters in many countries. There had also been similar praise for the temporary acceptance of electronically issued proofs of origin by partner countries, who do not adopt such systems yet. Many regional organizations, such as the Arab League and the COMESA, were keen to issue official recommendation urging member states to accept certificate of origin issued electronically with an electronic seal and electronic signature during the pandemic so long there is a possibility to verify the certificate’s data.<sup>13</sup>

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<sup>8</sup> “Decision No. 1/2006 of The EU-Egypt Association Council of 17 February 2006 amending Protocol 4 to the Euro-Mediterranean Agreement, concerning the definition of the concept of ‘originating products’ and methods of administrative cooperation,” *Official Journal of the European Union*, 13 March 2006, Document code (2006/185/EC), L 73/15.

<sup>9</sup> European Union DG TAXUD, “*EU Communication to Contracting Parties to the PEM Convention entitled ‘Application of origin proof requirement during the CoVid19 crisis,’*” Document no. TAXUD 2042185/20 – EN, 26 March 2020.

<sup>10</sup> Decision No.1/2006, Op. Cit.

<sup>11</sup> EU Document no. TAXUD 2042185/20, Op. Cit.

<sup>12</sup> “COVID-19: A 10-Point Action Plan to Strengthen International Trade and Transport Facilitation in Times of Pandemic,” *UNCTAD, Policy Brief No. 79, April 2020.* Available at: [https://unctad.org/en/PublicationsLibrary/presspb2020d3\\_en.pdf](https://unctad.org/en/PublicationsLibrary/presspb2020d3_en.pdf) [ Accessed 13 July 2020]

<sup>13</sup> League of Arab States. *Minutes for the Exceptional Meeting of the Permanent Technical Committee for Arab Rules of Origin.* Document no. L14/S (20/05)/01T (0175), 11 May 2020.

E-certification is a facilitation for the exporter to submit electronically all relevant proofs during the initial stage of application to obtain the needed authorization and issue the certificate of origin. Current international practice reveals two models for E-Certification. First model adopts only digitalizing of the issuance/endorsement process, whilst enabling the exporter at the end to print the certificate with the custom's electronic cachet, QR Code, and possibly a verification link.<sup>14</sup> This model is applied through Turkey's Automation System for Certificate of Origin and Movement Certificates (MEDOS), Singapore's GeTS electronic certificate of origin, and Vietnam's Electronic Origin Management and certification system ECOSYS. Second is the self-certification model, "where the issuing authority is not involved in every single issuance of proof of origin."<sup>15</sup> Through this system "producers, manufacturers, exporters or importers expressly certifies that the goods to which the certificate relates are considered originating according to the applicable rules of origin."<sup>16</sup> This system is manifest in the E-certificate of the COMESA, which should be piloted soon in 15 COMESA member states as well as the Registered Exporter (REX) System, which is currently applied in the EU's unilateral trade with Least Developed Countries within the framework of the Generalized System of Preferences (GSP) schemes, and which the EU has suggested within the revision of the pan Euro-Mediterranean convention on preferential rules of origin.<sup>17</sup>

Despite the adoption of E-certification by some countries, the current pandemic highlights the importance of speedy steps towards harmonization on regional level. The digitalization of proofs of origin and relevant clearance documents have been a subject of constant debate within different negotiation fora, for despite its multiple benefits, some countries still reject its adoption or its acceptance from other partner countries due to the lack of infrastructure, technical knowledge, and reassurances for combating fraud.<sup>18</sup> Its benefits in expediting the certification process highlights the importance of an agile regional action addressing such deficiencies. This will include the wise direction of investments and regional technical cooperation programs in helping all member states build the needed infrastructure to adopt this system and learn from the existing best practices.

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<sup>14</sup> Yaşam ÇİÇEK, "Presentation on *Automation System For Certificates of Origin and Movement Certificates (MEDOS) within the Second Regional Workshop on the Digitalization of the Certificate of Origin in the Arab Countries*," organized by the International Trade Center, 03-04 December 2018, Casablanca.

<sup>15</sup> Mette Azzam, Presentation on *Electronic Certificates of Origin and WCO Guidelines on Certification within the Workshop on Electronic Certificate of Origin (ECoO) For the Agadir Agreement member countries*, Agadir Technical Unit, 5-6 December 2018, Casablanca.

<sup>16</sup> World Customs Organization, "*Guidelines on Certification of Origin*," issued July 2014 and updated June 2018. Available at: <http://www.wcoomd.org/-/media/wco/public/global/pdf/topics/key-issues/revenue-package/guidelines-on-certification.pdf?la=en#:~:text=%E2%80%9Cself%2Dcertification%20of%20origin%E2%80%9D,ON%20CERTIFICATION%20OF%20ORIGIN%20c>. [Accessed on 11 July 2020]

<sup>17</sup> Sherif Erfan. "The Practical Implications of AEO on Preferential Origin Certification." *Global Trade and Customs Journal*, Volume 14, Issue 10, 2019. Available at: <https://kluwerlawonline.com/journalarticle/Global%20Trade%20and%20Customs%20Journal/14.10/21859> [Accessed on 24 July 2020]

<sup>18</sup> Rwatida Mafurutu, "Use of Electronic Certificates of Origin now and beyond COVID-19 in intra-African Trade." TRALAC Blog, 29 June 2020. Available at: <https://www.tralac.org/blog/article/14710-use-of-electronic-certificates-of-origin-now-and-beyond-covid-19-in-intra-african-trade.html> [Accessed 11 July 2020]

#### 4. Lagging provisions: What could be done better?

There had been four main areas that lagged behind during the current pandemic, namely territorial requirements provisions, cross border trade provisions, cumulation provisions, and mechanisms for circulation of information.

First on territorial requirements provisions, a quick review on its current status shows that its focus has only been to guarantee direct transportation and the non-alteration of goods in cases of transit through a third country. The current provisions do not guarantee enough facilitation and protection in times of crises with regards to Landlocked Developing Countries (LLDCs).<sup>19</sup>

Some regional organizations, as the COMESA and even the larger African Tripartite FTA,<sup>20</sup> have already taken a step forward and began drafting guidelines on the movement of goods and services across the region during the COVID-19 Pandemic.<sup>21</sup> The guidelines contain facilitations for cross border movement of essential supplies, facilitation for different modes of cross border transportation, and monitoring and evaluation mechanism for sharing best practices. Away from the fact that their mandatory status remains in question, it could be a better approach to put these efforts in a long-lasting format, which would serve for different crisis situations.

The current crisis might be a good chance to further develop these provisions especially with the growing global appetite for including trade facilitation provisions within RoO chapters. The inclusion of special provisions guaranteeing cooperation among transit countries and landlocked developing countries in times of crises to support the smooth functioning of transit, transport and trade corridors; ensure freedom of transit; and pledge the fast tracking of essential goods in times of crises could be a good starting point.<sup>22</sup>

Second, with regards to cross-border trade provisions, lodging Simplified Trade Regimes (STR) for small scale cross-border traders has been one of the recommendations within several guidelines on the movement of goods issued in the aftermath of the pandemic.

STRs usually provides for simplified clearance procedures, including a simplified certificate of origins and customs document, for a common list gazette by each member state. In the COMESA for example, before the pandemic, this system was piloted in a few countries and the status of its implementation showed that common lists were not fully respected or operationalized and excessive charges were applied on traders.<sup>23</sup> With the Covid19 experience, and based on the

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<sup>19</sup> UNCTAD Policy Brief, 2020, Op. cit.

<sup>20</sup> The African Tripartite included the COMESA, SADC, and EAC.

<sup>21</sup> Sherif Erfan, 2019, Op. cit.

<sup>22</sup> World Customs Organization, “WCO and UN-OHRLLS call for trade and transit facilitation during the COVID-19 pandemic.” 29 May 2020. Available at: <http://www.wcoomd.org/en/media/newsroom/2020/may/wco-and-un-ohrls-call-for-trade-and-transit-facilitation-during-the-covid-19-pandemic.aspx> [ Accessed on 15 July 2020].

<sup>23</sup> Mary Amumpaire, “Current Status of Implementation of the Simplified Trade Regime (STR): Issues and Some Proposals for Improvement,” COMESA, 26 March 2019. Available at: <https://glftp.comesa.int/2019/03/26/current-status-of-implementation-of-the-simplified-trade-regime-str-issues-and-some-proposals-for-improvement/> [ Accessed 17 July 2020]

system's evaluation, some recommend the waiver of certificate of origin, relaxation of customs documentation, and possibly the expansion of the STR common list.<sup>24</sup>

Third, on regional circulation and coordination of new national trade measures, many international organizations and non-governmental initiatives, namely by ITC, WTO, WCO and the St. Gallen's Global Trade Alert, have rapidly established special portals to map all the new temporary trade measures and help the business community to adjust. On the regional level, the COMESA has recently launched the COVID information exchange platform to exchange information on availability of essential products within the region.<sup>25</sup>

Despite the tremendous effort carried out by many international organizations to map these measures, many companies were yet challenged to make use of such information due to language barrier or due to their unawareness of its existence. Pandemic or not pandemic, it would be useful to join efforts with national entities and diplomatic missions abroad to advertise and publicize such portals on national official websites.

Last, concerning cumulation provisions, its application has been puzzling way before the pandemic. Despite that and with the witnessed scarcity of essential goods during the pandemic, it is evident that no country is ready for such crises on its own. Cumulation provisions, if coupled with good investment packages, could be a good chance to establish regional joint agricultural projects that would help regional communities to build sufficient manufacturing capacity to supply essential medical goods and achieve food security in the region.<sup>26</sup>

## 5. Conclusion

Times of crisis are indeed a true test, not just for individuals but also for our supply chains, economic structures, and legal frameworks. And if we are to rate the utility of RoO chapters in response to this crisis, it would merely pass with a 50 percent success due to the preferential tariff scheme paralysis in the face of restrictive national measures on essential goods.

One of the most important observation of the business community during the past few months was "lack of harmonization of interventions, measures, and recommendations to COVID-19 on regional and national levels."<sup>27</sup> The analysis above also proved that most of the challenges faced in the application of RoO provisions during the pandemic arise from challenges identified a long time before the pandemic, but a prompt collective action was never taken towards it. This reassures a

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<sup>24</sup> Simonetta Zarrilli and Mariangela Linoci, 2020, Op. cit.

<sup>25</sup> Mwangi Gakunga. "COMESA Develops COVID19 Online Portal to Spur E-trade," *COMESA Website*, 17 July 2020. Available at: <https://www.comesa.int/comesa-develops-covid-19-online-portal-to-spur-e-trade/> [Accessed on 19 July 2020]

<sup>26</sup> Melaku Geboye Desta, "Covid-19 and Export Restrictions: the Limits of International Trade Law and Lessons for the AfCFTA," *UNECA Policy brief*, 19 May 2020. Available at: [https://www.uneca.org/sites/default/files/PublicationFiles/atpc\\_brief-covid-19\\_export\\_restrictions-legal-analysis\\_eng\\_final1.pdf](https://www.uneca.org/sites/default/files/PublicationFiles/atpc_brief-covid-19_export_restrictions-legal-analysis_eng_final1.pdf) [Accessed on 29 June 2020]

<sup>27</sup> "CBC and SADC BC Joint Position Statement: Addressing Trade Restrictive Measures during the COVID-19 Pandemic," *TRALAC Blog*, 5 May 2020. Available at: <https://www.tralac.org/documents/resources/covid-19/regional/3785-joint-position-statement-by-cbc-and-sadc-bc-on-addressing-trade-restrictive-measures-during-covid-19-june-2020/file.html> [Accessed 18 July 2020]

lack of coordinated agile governance in the functioning of regional arrangements that needs to be addressed.

Last but not least, and perhaps to guarantee not falling into the same mistakes again if another crisis hits, guaranteeing the commitment of contracting parties to collective problem solving at regional level would be essential for the success of any coming revisions.

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