

Chapter 9

An Inventory of Non-tariff Measures in the Philippines

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April 2016

This chapter should be cited as

de Dios, L.C. (2016), 'An Inventory of Non-tariff Measures in the Philippines', in Ing, L.Y., S. F. de Cordoba and. O. Cadot (eds.), *Non-Tariff Measures in ASEAN*. ERIA Research Project Report 2015-1, Jakarta: ERIA, pp.113-125.

CHAPTER 9

An Inventory of Non-tariff Measures in the Philippines

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This chapter describes the work that was undertaken to compile, validate, and register current non-tariff measures (NTMs) in the Philippines from official sources, with emphasis on ensuring the comprehensiveness and quality of the information. The inventoried NTMs are then analysed briefly and policy recommendations are provided to streamline the NTMs and develop measures that would meet the goals of protecting health and the environment.

1. Context

NTMs, being policy instruments,³³ are found within a country's legal and institutional framework. In the Philippines this framework consists of (i) the Constitution as the basic law of the land, (ii) Republic Acts or statutes passed by Congress that uphold the spirit of the Constitution, (iii) executive orders or rules of a general or permanent character executing statutory power that are issued by the President, and (iv) administrative issuances or rules and regulations that implement the law and are issued by government agencies authorised by law to make such rules and regulations, issue licences, and grant rights or privileges.

Organizationally, regulatory agencies have different levels indicating their degree of autonomy. This reflects their position in the executive branch of government: (i) the *Bangko Sentral ng Pilipinas* has the highest status as an independent central monetary authority; (ii) a department is the primary sectoral subdivision of the executive branch; (iii) 'attached' agencies have a lateral relationship with a department for policy and programme coordination in which the department has a representative in its governing body but cannot interfere with its internal operation, attached boards or commissions have regulatory and adjudicatory powers outside the control of the department; (iv) the next level are regulatory agencies whose personnel and financial resources are under the administrative supervision of a department; and (v) the last level are agencies under the control and supervision of a department, for example, line bureaus

³² The assistance of Paul Feliciano is gratefully acknowledged.

³³ Defined broadly as measures taken to implement a guiding principle.

(Cariño, 2002). All official documents are written in English, being the country's official language aside from Filipino. Laws and executive orders take effect when published in the Official Gazette or newspapers of general circulation.

In the case of administrative issuances, the law – specifically Executive Order No. 292 or the Administrative Code of 1987—stipulates that copies should be submitted by the issuing agency to the University of the Philippines Law Center and that rules in force as of 1987 were to be filed within that year for their sanctions to be enforceable. Issuing agencies are also required to keep a permanent register of all rules and regulations and make this available to the public. The University of the Philippines Law Center then set up the Office of National Administrative Register for discharging its function. Issuances to be filed with the office include (i) statements of general applicability that implement or interpret a law; (ii) statements of general applicability that fix and describe the procedures in, or practice requirements of, an agency; (iii) amendments or repeal of any prior rule; (iv) regulations affecting private rights, privileges, occupation, or business; and (v) administrative disciplinary action and the governing rules of procedure.

NTMs are thus found mainly in administrative issuances and occasionally in executive orders. Administrative issuances are generally classified into circulars and orders. Circulars prescribe policies, rules, and regulations, and procedures that are applicable to entities outside the government and designed to provide the means for carrying out or supplementing provisions of the law. Orders are directed to particular offices, officials, or employees on specific matters. In practice, issuances take various other forms such as memoranda, memorandum orders, memorandum circulars, and regulations, and except for presidential issuances,³⁴ the definitions or differences between these forms are not described.

³⁴ EO 292, Book III, Chapter 2 on the ordinance powers of the President: (i) administrative orders are acts that relate to particular aspects of governmental operations in pursuit of his duties as administrative head, (ii) memorandum orders are acts on matters of administrative detail or of subordinate or temporary interest that only concern a particular office or officer, (iii) memorandum circulars are acts on matters relating to internal administration which are being brought to the attention of some offices, for information or compliance, and (iv) general or special orders are acts of the President in his capacity as Commander-in-Chief of the Armed Forces.

2. Methodology

The inventory targeted particular NTM types³⁵ from the NTM classification scheme (UNCTAD, 2015), covering all relevant issuances as comprehensively as possible.

The approach was to (i) identify official sources of information, (ii) extract the relevant issuances, (iii) validate the information, (iv) identify the NTMs contained in the issuances and classify them, and (v) register the information in the template, including NTM type and products covered.

Official sources were of two kinds – official compilations of regulations or products, and individual issuing agencies. The former guided the search with the titles or topics of officially disclosed issuances, while the latter provided the text of these legal documents and other related issuances. Official compilations took the form of consolidated lists, repositories, or notifications to international bodies. These were used to draw up a base list of issuances.

The issuances in the base list were examined and also served as a springboard for further research. For instance, lists of regulated imports only consider the regulation that requires the import license rather than such prerequisites as the importer or the product registration. Given that the latter are usually provided in a separate issuance, these had to be sought.

Agency websites were scrutinised in parallel with the above compilations, not only to obtain digital copies of the legal documents, but also to identify other relevant issuances. The websites vary widely, from the highly informative and systematic to those with limited or less orderly information. Agency personnel were contacted directly to request, clarify, or confirm information. Other online sources were searched for copies of documents that could not be found in agency websites.

The Official Gazette (www.gov.ph) is the source of Republic Acts, executive orders, presidential decrees, and other issuances of the President.

3. Analysis of registered non-tariff measures

The results of the inventory are summarised in the following tables. Overall, 295 regulations were evaluated, yielding 854 NTMs.³⁶ Of these, 542 or about 63 percent were

³⁵ These are type A (sanitary and phytosanitary measures or SPS), B (technical barriers to trade or TBT), C (pre-shipment inspection and other formalities), E (non-automatic licensing, quotas, prohibitions, and quantity-control measures other than SPS or TBT), F (price-control measures including additional taxes and charges), G (finance measures), H (measures affecting competition), I (trade-related investment measures), and P (export-related measures).

³⁶ This excludes one anti-dumping measure that was added by the UNCTAD team to the inventory.

notified to the WTO, whether in the Trade Policy Review of 2012, the Import Licensing Agreement, Application of SPS Measures, or the TBT Agreement.

Table 9.1. Number of Regulations and Non-tariff Measures

Comprehensiveness Indicator	Number
Total number of coded regulations	295
Total number of coded NTMs	854
Total number of coded NTMs reported to the WTO	542
Total number of affected products (HS lines)	9,820
Proportion of products affected (%)	100%
Total issuing institutions	37

Source: Authors' calculation based on the newly constructed 2015 NTM database ASEAN-ERIA-UNCTAD raw data.

The Philippines uses the 8-digit ASEAN Harmonized Tariff Nomenclature (AHTN) of 2012,³⁷ which is based on the latest version of the Harmonized Commodity Description and Coding System (Harmonized System [HS]) of the World Customs Organization and its amendments. There are a total of 9,820 national HS lines and all are affected by NTMs.

TBTs are the most numerous NTMs, making up 42.1 percent of the total number, followed by SPS measures, which constitute 27.3 percent (Table 9.2). Export-related measures are the third major kind, reaching 17.1 percent of the total, although this is also because all NTMs affecting exports are combined in a single chapter.

³⁷ The World Customs Organization has been undergoing a review of HS 2012 with the proposed changes are to be implemented in 2017, while the AHTN Task Force is aligning the AHTN 2012 with HS 2017 and amending it based on the review criteria. ASEAN member states are to implement the AHTN 2017 by 1 January 2017.

Table 9.2. Number of Non-tariff Measures by Type and Products Affected

Code	NTM Type	Number of NTMs	Total NTMs (%)
A	Sanitary and phytosanitary (SPS) measures	233	27.3
B	Technical barriers to trade (TBT)	360	42.1
C	Pre-shipment inspection and other formalities	24	2.8
E	Non-automatic licensing, quotas, prohibitions, and quantity control measures other than SPS or TBT reasons	56	6.5
F	Price control measures including additional taxes and charges	23	2.7
G	Finance measures	11	1.3
H	Measures affecting competition	1	0.1
I	Trade-related investment measures	–	
P	Export related measures	146	17.1
Total coded NTMs		854	100

Source: Authors' calculation based on the newly constructed 2015 NTM database ASEAN-ERIA-UNCTAD raw data.

The frequency of NTMs by subcategory is summarised in Table 9.3. Among the TBTs, conformity assessment measures are the most common, followed by prohibitions or restrictions, while the order is reversed for SPS measures although only slightly different in number. Labelling requirements are the next most frequent imposition under both types.

For export-related measures, licences/quotas/prohibitions make up the majority, followed by technical measures.

The NTMs were contained in the issuances of 37 government agencies, which are at the level of the department or attached bureau, authority, commission, administration, corporation, board, or institute. The top 10 agencies together issued 70 percent of all regulations, while the top five together made up about 50 percent of all issuances.

Three line bureaus under the Department of Agriculture – the Animal Industry, the Plant Industry, and Fisheries and Aquatic Resources – issued the largest number equivalent, respectively, with 14.8 percent, 12.6 percent, and 9.4 percent of the total. SPS measures were concentrated in these agencies, as well as at the Food and Drug Administration and the National Meat Inspection Service, given their mandates to protect human and animal health. In contrast, TBT measures were imposed by several different agencies. About nine NTMs were implemented simultaneously by multiple agencies.

Environment protection measures were the next major group of NTMs. These came mainly from the Environmental Management Bureau and the Fertilizer and Pesticides Authority. Agencies heading the 'Others' list had similar objectives, namely the Forest Management Bureau

and the Department of Environment and Natural Resources (whose issuances were implemented by the Biodiversity Management Bureau and the Philippine Ozone Desk).

Table 9.3. Frequency of Non-tariff Measures by Subcategory

Code	NTM Subcategory	Number
A1	Prohibitions/restrictions of imports for SPS reasons	88
A2	Tolerance limits for residues and restricted use of substances	1
A3	Labelling, marking, and packaging requirements	28
A4	Hygienic requirements	5
A5	Treatment for elimination of plant and animal pests and disease-causing organisms in the final product	14
A6	Other requirements on production or post-production processes	10
A8	Conformity assessment related to SPS	85
A9	SPS measures, n.e.s.	2
B1	Prohibitions/restrictions of imports for objectives set out in the TBT agreement	113
B2	Tolerance limits for residues and restricted use of substances	8
B3	Labelling, marking, and packaging requirements	56
B4	Production or post-production requirements	26
B6	Product identity requirement	4
B7	Product-quality or -performance requirement	16
B8	Conformity assessment related to TBT	137
C1	Pre-shipment inspection	2
C3	Requirement to pass through a specified port of customs	5
C4	Import-monitoring and surveillance requirements and other automatic licensing measures	3
C9	Other formalities, n.e.s.	14
E1	Non-automatic import-licensing procedures other than authorizations for SPS or TBT reasons	38
E2	Quotas	6
E3	Prohibitions other than for SPS and TBT reasons	9
E6	Tariff-rate quotas	3
F1	Administrative measures affecting customs value	1
F6	Additional taxes and charges levied in connection to services provided by the government	19
F7	Internal taxes and charges levied on imports	3
G1	Advance payment requirement	9
G4	Regulations concerning terms of payment for imports	1
G9	Finance measures, n.e.s.	1
H1	State-trading enterprises, for importing; other selective import channels	1
P1	Export-license, -quota, -prohibitions, and other quantitative restrictions	74
P2	State-trading enterprises, for exporting; other selective export channels	2
P4	Measures on re-export	2
P5	Export taxes and charges	1
P6	Export technical measures	57
P7	Export subsidies	3
P8	Export credits	1
P9	Export measures, n.e.s.	6
	Total	854

Source: Authors' calculation based on the newly constructed 2015 NTM database ASEAN-ERIA-UNCTAD raw data.

All AHTN product groups are subject to NTMs. In fact, multiple NTMs are imposed on the majority: 30 out of the 97 AHTN chapters, or about one-third, are covered by 11 to 20 NTM types, another one-fifth are affected by six to ten NTM types. However, about one-fifth are also unaffected by NTMs, mainly textiles and footwear.

A counterpart tabulation for the product groups defined in the template shows that 16 out of 27, or 73 percent, are subject to 10–22 NTM types. Only two are affected by one NTM type, while the rest have between two and nine NTM types imposed on them.

A summary of the specific subcategories of NTMs that affect each of the 97 AHTN chapters below shows the NTM chapters that apply to broad product groups. Both SPS and TBT measures are mainly imposed on animals and animal products, vegetable products and foodstuffs, as well as mineral products (because salt, which is heavily regulated, is classified here) and chemicals and allied products. The rest are subject to TBT measures.

Table 9.4. Non-tariff Measures Types affecting Each Product Group

HS Chapter	Product Group	NTM Chapter							
		A	B	C	E	F	G	H	P
01-05	Animal & animal products	A1, A3, A4, A5, A6, A8 , A9	B1, B3, B8	C1, C3, C4, C9	E1 , E3, E6		G1	H1	P1, P6
06-15	Vegetable products	A1, A3, A4, A5, A6, A8	B1 , B2, B3, B4, B6, B7, B8	C1, C3, C4, C9	E1 , E3, E6	F6, F7	G1, G4	H1	P1, P6
16-24	Foodstuffs	A1, A3, A6, A8	B1, B3, B4, B6, B7, B8	C1, C4, C9	E1, E2, E6	F1, F6, F7	G1	H1	P1, P6, P9
25-27	Mineral products	A1, A3, A5, A6, A8	B1 , B2, B3, B4, B7, B8	C1, C9	E1	F6, F7	G1	H1	P1, P6
28-38	Chemicals & allied Industries	A1, A3, A5, A6, A8	B1 , B2, B3, B4 , B6, B7, B8	C1, C9	E1, E2, E3	F6, F7	G1, G9	H1	P4, P6, P9
39-40	Plastics/rubber	A3	B1, B3, B4, B8	C1, C9	E1 , E3	F1	G1	H1	P1, P6
41-43	Raw hides, skins, leather, & furs		B3, B4, B8						P6
44-49	Wood & wood products	A1, A8	B1, B3, B8	C1, C3, C9	E1, E3	F6	G1, G9	H1	P1, P5, P6
50-63	Textiles	A8	B1, B3, B8	C4	E1, E3	F1		H1	P1, P6
64-67	Footwear/headgear		B1, B3, B8	C9			G1	H1	
68-71	Stone/glass	A8	B1 , B3, B4, B8	C9	E1	F7	G1	H1	P1, P2, P6
72-83	Metals		B1, B2, B3, B4, B8	C9	E1	F1, F7	G1	H1	
84-85	Machinery/electrical	A8	B1 , B2, B3, B4, B7, B8	C9	E1 , E2	F6	G1	H1	P1, P6
86-89	Transportation	A8	B1 , B3, B7, B8	C9	E1 , E3	F1, F6, F7	G1	H1	P1, P6
90-97	Miscellaneous		B1, B2, B3, B4, B8	C9	E1, E2, E3		G1	H1	P1, P6 , P9

Source: Authors' calculation based on the newly constructed 2015 NTM database ASEAN-ERIA-UNCTAD raw data.

4. Recommendations

4.1. Streamlining existing regulations

Since our inventory combines information from official compilations and individual agencies, it is comprehensive in terms of the NTM chapters that have been selected for this work. Validation by the agency as to (i) possible exclusions, (ii) validity period of all inclusions, and (iii) specification of products, would constitute further work to make it definitive. While no major changes in the legal and institutional framework are expected, an annual review of the inventory is recommended in order to include new or modifying regulations that are expected to be issued by agencies in the exercise of their authority.

The inventory work also revealed the following:

(a) Publicly available records are incomplete. The quarterly compilation of the official repository is also non-chronological; its website has been inaccessible in recent months. Regulations do not indicate their current validity, or specify the amended regulation. Other websites describe procedures and requirements but do not provide the text of the regulation.

(b) Automated systems of storage or cataloguing do not appear to exist. Older personnel depend on their own 'institutional' memory; newer ones do not have the same familiarity with the regulations. Physical copies of valid old issuances still have to be digitised; one agency's manual can only be obtained by purchase.

(c) The concept of 'regulated' products is usually understood in terms of certain types of NTMs only, such as quotas, prohibitions, or licensing whether or not for SPS and TBT reasons, as most are not familiar with all other NTMs. Hence, official lists are confined to these types. Yet those devoted to the same NTM did not contain the same information.

(d) There are measures that are not being enforced, possibly due to their impracticality or cost-ineffectiveness. The applicability of regulations to domestic products is not always specified.

(e) The language of a number of regulations is unclear or indirect and circuitous, and double or even multiple negatives are used.

(f) Regulations do not specify the AHTN codes of the products covered. Product descriptions are too broad or vague. Some are expressed in 'other than' terms, or affect products of certain characteristics only. New or unfamiliar products are not defined.

These indicate the need for an automated repository system that compiles all issuances from all agencies and provides full information and ease of search and retrieval. The system could incorporate an NTM classification functionality to enable the identification of the relevant

provisions in the issuances. The Philippine National Trade Repository³⁸ as a single source of information on trade-related matters is an initiative in this direction.

Systematisation, however, has maximum positive impact only if the information that is being systematised is of high quality. For rigour and consistency of regulations, streamlining is thus imperative. Extraneous or redundant provisions and dead regulations must be removed, and only the most salient ones must be issued. They must be in plain language, with procedures or requirements reduced to the barest minimum, while providing all the information in precise terms. This will lower transactions costs and allow both the agency and the affected party to focus resources where they count most. Thus it encourages efficiency and compliance.

Streamlining can be done through process reengineering or business process analysis, a methodology described in the *Business Process Analysis Guide to Simplify Trade Procedures* (hereinafter, BPA Guide [UNNExT, UNESCAP, and UNECE, 2012]). Defined as ‘the study of existing business processes within one or across several entities.... to understand attributes of the business processes and relationships among them’, the BPA results serve as a baseline for trade facilitation measures such as the simplification of trade procedures or of documentary requirements and alignment with international standards, or the automation of trade transactions and electronic documents for single window systems.

The BPA Guide describes three sequential phases:

Phase I: Scope setting (Step 1. Define project scope. Step 2. Develop detailed work plan and secure resources)

Phase II: Data collection and process documentation (Step 3. Acquire background information. Step 4. Conduct interviews and document captured data)

Phase III: Process analysis and recommendations development (Step 5. Analyse the ‘as-is’ process. Step 6. Develop and propose recommendations)

The *Streamlining Non-tariff Measures: A Toolkit for Policy Makers* (Cadot et al., 2012) provides a detailed approach for an NTM review, describing the necessary institutional conditions, and following the same basic components of data collection and the assessment of their economic costs and benefits. The toolkit stresses that the streamlining process must be

³⁸ Launched in October 2015 as a web-based single source of comprehensive information on all trade-related matters (<http://pntr.gov.ph/about.html>), the Philippine National Trade Repository (PNTR) was established by the Ad Hoc Technical Working Group on PNTR under the Committee on ASEAN Economic Community, which is headed by the Bureau of Import Services of the Department of Trade and Industry, with 50 trade regulatory and trade policy agencies as members. It is a commitment under the ASEAN Trade in Goods Agreement that will be linked with the ASEAN Trade Repository, and complies with transparency obligations under the WTO Agreement on Trade Facilitation.

analytically sound and balance the reduction of trade costs against the preservation of public objectives.

An understanding of the business process requires research into related laws and regulations, forms, and documents, interviews with participants, and onsite observation. Interview questions³⁹ must be thorough and produce insights into the process. The sequence of activities required to complete a process is mapped with activity diagrams, process descriptions, and a time-procedure chart. These 'as-is' business process models are then verified.

A salient point that must be established by the agency at the start of a BPA is: what is the objective of the regulation? The inventory shows that aside from the usual mandates (protecting public health, the environment, consumer welfare, safety, national security, or morality, or developing particular industries), there are requirements to prove an entity's legitimacy, or provide information that would enable control over the goods or entity in case of non-compliance, or pay fees. These also have to be rationalised.

The business process is then analysed to identify bottlenecks and opportunities for improvement. Issues to be investigated are the efficiency (caused by redundancies or unnecessary requirements), effectiveness (amount of rework), reliability, transparency, and predictability of the business process (UNNEXt, UNESCAP, and UNECE, 2012). Diagrams illustrating 'to be' processes may accompany the recommendations, which may include any of the following: resequencing of activities, elimination of redundant data, documents, procedures or activities that do not add value to meeting the measure's objectives, integrating business processes that have similar objectives, merging procedures to eliminate unnecessary documents, harmonising data requirements with international standards, and automation and information sharing. Also possible are the elimination of outdated laws and regulations, the privatisation of quality control-related tasks, modification or creation of laws and regulations, and the use of international best practice.

Tasks should not be fragmented, potential bottlenecks must be identified and avoided, and data that will not be used must not be collected. Timing must also be taken into account.

It is also essential for agencies to have a better understanding of NTM types. Aside from using simple language, regulations must state explicitly whether they are applicable to imports, exports, and/or domestic products. And they must specify the AHTN codes of the products affected. This pre-empts interpretation, misunderstanding, or discretionary decision-making.

³⁹ The BPA Guide provides sample questions in Box 3B-16 on page 43.

Nine efficient regulation principles of the Organisation for Economic Co-operation and Development (OECD) are listed in the toolkit (Cadot et al., 2012) to guide the design and implementation of regulations: (i) transparency and openness, (ii) non-discrimination, (iii) avoidance of unnecessary trade restrictiveness, (iv) use of performance-based regulation, (v) use of regulatory impact assessment (RIA),⁴⁰ (vi) administrative simplification, (vii) use of internationally harmonised measures, (viii) ensuring the quality of conformity assessment procedures, and (ix) incorporation of competition principles in regulatory practice. UNCTAD (2013) also reiterates the importance of establishing a rule-making process that is transparent and complies with international obligations.

4.2. Developing NTMs to protect consumer health and the environment

The inventory showed that the bulk of NTMs are imposed to protect health and the environment. These are legitimate policy objectives. Under the WTO (www.wto.org), members can adopt NTMs for these objectives, as long as the measures comply with the rule that they do not create unnecessary obstacles to trade. In the exceptions to the rules, members may also justify General Agreement on Tariffs and Trade (GATT)-inconsistent measures if these are necessary to protect human, animal, or plant life or health (Article XX(b)), or relate to the conservation of exhaustible natural resources (Article XX(g)). To prevent the misuse of trade-related measures, it further stipulated that an environmental NTM may not be applied in an arbitrary or unjustifiably discriminatory manner between countries where the same conditions prevail, or as a disguised restriction on trade.

As Article XX allows the imposition of GATT-inconsistent measures for health or environment purposes, it also requires proof that a measure is intended to protect human, animal, or plant life or health, that the measure is necessary, or that it relates to the conservation of exhaustible natural resources.

Such trade measures must therefore still be developed carefully. Previous analysis of ASEAN NTMs recommended the following criteria for their rationalisation (i) transparent and non-discriminatory application, (ii) scientific basis, and (iii) the absence of an alternative that can

⁴⁰ RIA is best practice to improve the quality of regulations in terms of transparency, rigor, accountability, and consistency, and minimal unnecessary and excessive requirements. The methodology includes cost-benefit analysis and stakeholder consultation to ensure that the regulation is effective and efficient in achieving its policy objectives while minimizing negative effects. RIA was piloted at the Department of Finance, Department of Labor and Employment, and the Department of Tourism in 2012.

achieve the objective in a less distortive manner (de Dios, 2004). These may serve as a guide for their development, complementing the OECD's efficient regulation principles.

Indeed, the SPS and TBT agreements prescribe a science-based approach for such NTMs and also encourage adherence to international standards. The agreements impose three types of discipline: (i) on the process of adoption of the measures and their implementation, under which NTMs should be designed and implemented in a non-discriminatory manner; (ii) on their proportionality to the objective sought, under which NTMs should be the least trade-restricting amongst the available instruments, also known as the efficiency criterion; and (iii) on their necessity, which implies that no other less trade-inhibiting instrument is appropriate. Regulations that are more stringent than international standards must be justified based on risk assessment (UNCTAD, 2013).

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