

Chapter 6

Non-Tariff Measures in Myanmar

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CHAPTER 6

NON-TARIFF MEASURES IN MYANMAR¹**Ha Thi Thanh Doan**

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1. Introduction

This report presents the major findings from the updated Myanmar database of non-tariff measures (NTMs) in the Association of Southeast Asian Nations (ASEAN). A joint effort between the Economic Research Institute for ASEAN and East Asia (ERIA) and the United Nations Conference on Trade and Development (UNCTAD), the database provides the most comprehensive information on trade-related regulations at the NTM-product level for 10 ASEAN countries.

Section 1 introduces key trade reforms and provides an overview of the country's composition of exports and imports. Section 2 illustrates the legal system related to the issuance and management of NTMs. Section 3 explains the status of NTM utilisation, broken down by issuing agency, NTM type, and product. Section 4 recommends policies to further strengthen regulatory reform.

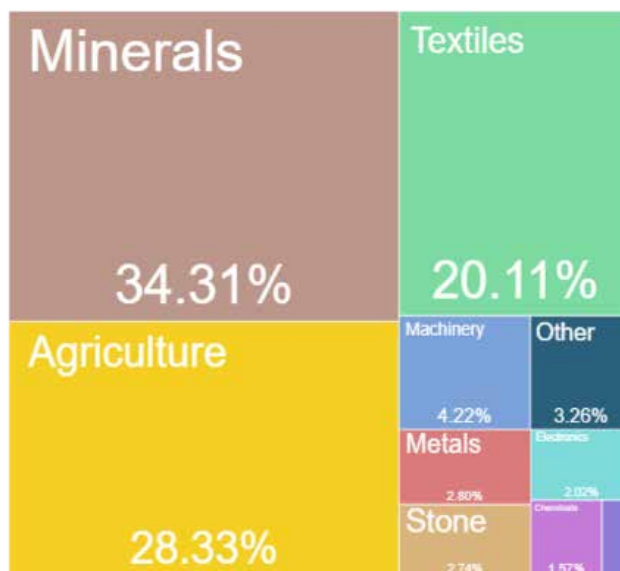
1.1. Composition of Trade***Exports***

Figure 6.1a and Figure 6.1b highlight three features of exports. First, resource-based sectors – minerals and agriculture – accounted for the lion's share of exports in 2016, followed by textiles. Within minerals, petroleum remained the most important export, contributing about 30% of the total export value in 2016, leaving dried legumes, the second-largest export, far behind at 9%. Second, textile exports comprised mainly a handful of products,

¹ Research assistance by Muhamad Rizqy Anandhika is gratefully acknowledged.

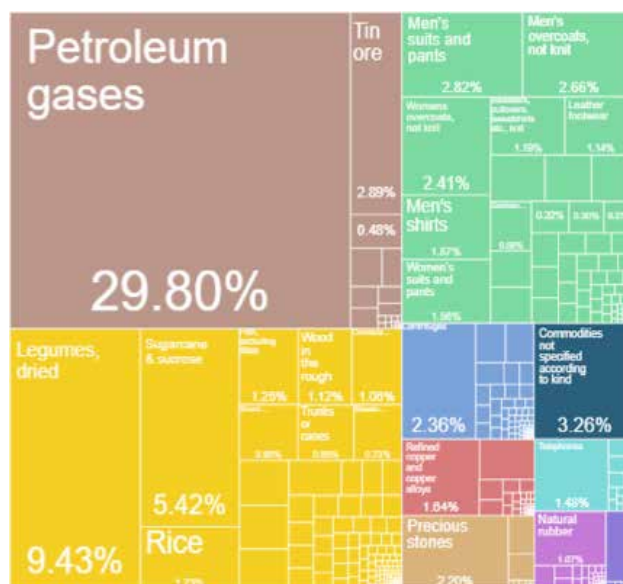
such as suits and pants, shirts, and overcoats. The lack of diversification made the country vulnerable to world price volatility. Finally, key exports created limited value-added. Products in the regional value chain, such as electronics and machinery, generated only around 6% of export earnings.

Figure 6.1a: Broad Composition of Exports, Myanmar, 2016



Note: Products are defined at the Harmonised System 1-digit level.
Source: CID (2019).

Figure 6.1b: Composition of Exports, by Subsector, Myanmar, 2016



Note: Products are defined at the Harmonised System 1-digit level.
Source: CID (2019).

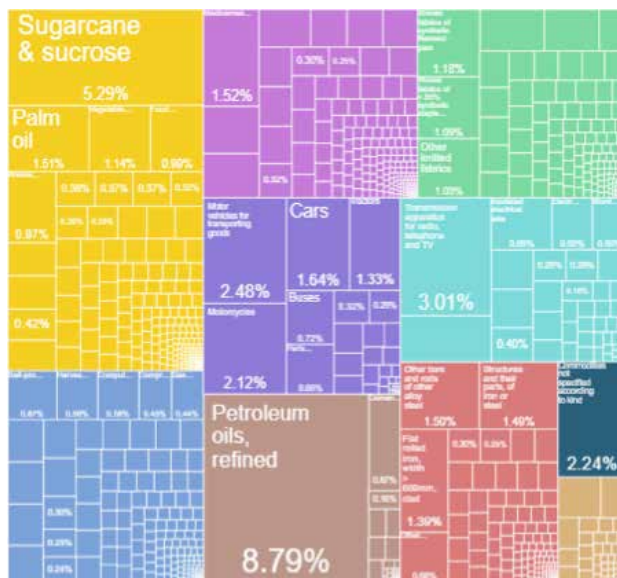
Figure 6.2a: Broad Composition of Imports, Myanmar, 2016



Note: Products are defined at the Harmonised System 1-digit level.

Source: CID (2019).

Figure 6.2b: Composition of Imports, by Subsector, Myanmar, 2016



Note: Products are defined at the Harmonised System 1-digit level.

Source: CID (2019).

Imports

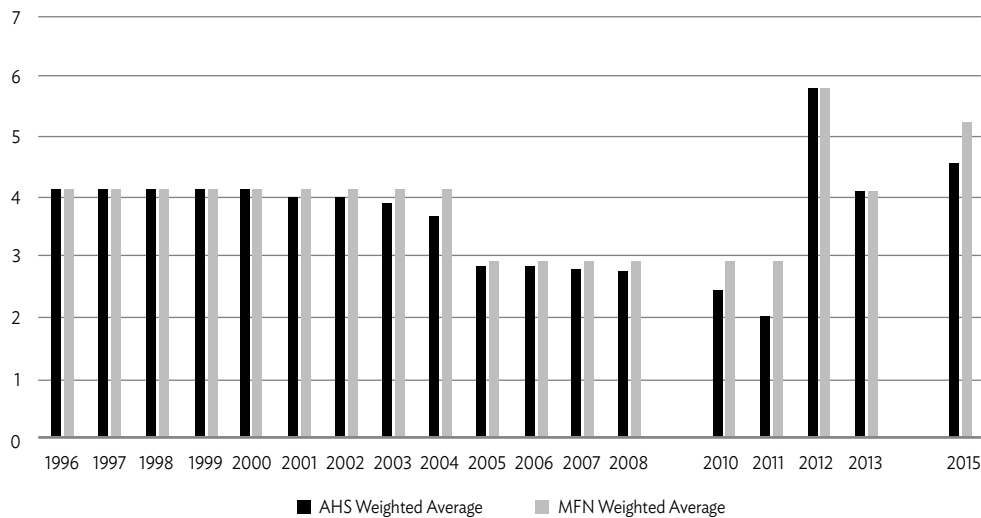
Imports are more diverse than exports. Of US\$22 billion of imports in 2016, agricultural products accounted for 20%. Capital goods and intermediate inputs also made up a significant portion of the import basket. Unlike exports, imports were not dominated by a single category: textiles, machinery, electronics, vehicles, minerals, and metals each accounted for approximately 10% of total imports.

1.2. Trade Reform

Despite being an original member of the World Trade Organization (WTO),² Myanmar was isolated from the world during decades of political turmoil. It was not until 2011, under a new, civilian-led government, that the country started to pursue significant reforms to stimulate structural shifts, improve national competitiveness, and promote economic growth. The comprehensive reforms included efforts to reintegrate the country into the global economy.

Following WTO principles, the government coordinated closely with ministries to facilitate trade by, first, issuing, amending, or revising a number of trade-related regulations in line with international commitments. The Export and Import Law, Foreign Investment Law, and Foreign Exchange and Management Law were all introduced in 2012. In principle, laws must be consistent with WTO agreements. As a WTO member, Myanmar imposed low import tariffs (Figure 6.3), which suggests there is not much room to further liberalise tariffs. Myanmar adopted international standards and technical regulations for sanitary and phytosanitary (SPS) measures and technical barriers to trade (TBT), including those from the International Organization for Standardization (ISO), ASEAN standards, CODEX for food, European Union for fishery products, British International Standards for pharmaceutical products, World Organization for Animal Health's standards for animal products, and International Electrotechnical Commission standards for electrical products, to name a few. Under WTO commitments, Myanmar does not apply tariff-rate quotas, quantitative restrictions, subsidies, safeguards, or countervailing measures. The government has relaxed regulations on import and export licensing by narrowing product scope subject to licenses (WTO, 2014).

² Myanmar became a member of the General Agreement on Tariffs and Trade on 29 July 1948, and of the WTO on 1 January 1995.

Figure 6.3: Import Tariffs, Myanmar, 1996–2015 (%)

AHS = effectively applied tariff, MFN = most favoured nation.

Note: AHS is the lowest available tariff. If a preferential tariff exists, it is used as the AHS. Otherwise, the MFN applied tariff is used. Both tariffs are weighted by trade value.

Source: WITS (2019).

Myanmar enters into regional trade arrangements, notably, free trade agreements within ASEAN and ASEAN Plus with China, India, the Republic of Korea, and Japan, amongst others. Under the ASEAN Trade in Goods Agreement, Myanmar grants 0%–5% tariffs on approximately 85% of tariff lines for imports from ASEAN, whilst Myanmar's exports to ASEAN enjoy similar treatment. ASEAN and East Asian countries account for approximately 90% of Myanmar's exports and imports, and these agreements are expected to speed up reforms, creating huge market potential and opportunities for the country to participate in expanding regional value chains.

Besides revising sector- and partner-specific regulations, Myanmar improved the trade environment through good regulatory practice. In 2014, the country conducted its first WTO trade policy review to improve outsiders' understanding of the country's trade and investment environment. The government ratified the Trade Facilitation Agreement in December 2015 and established the National Trade Facilitation Committee to implement it. To encourage private sector engagement in trade, in 2014, the government established the Private Sector Development Committee, which organises monthly formal consultations between government and business. The National Trade Repository is being developed to improve transparency and is connected to the ASEAN Trade Repository to facilitate regional trade (Papa and Doan, 2018).

2. Hierarchy of Laws and Regulations

2.1. Regulatory System

The Constitution is the supreme law, followed by, in descending order of importance, laws, rules, regulations, by-laws, notifications, orders, directives, and procedures (WTO, 2014). A lower-level regulation must be consistent with a higher-level one.

Laws are drafted by members of the two houses under Parliament – the House of Nationalities and the House of Representatives – or by ministries. The draft is circulated amongst line ministries for comment. After consulting related agencies, the initiator of the legislative bill revises the draft. The Ministry of Commerce may consult international organisations about NTMs. After consultation and revision, the bill is submitted to Parliament for approval. The bill then goes to the President Office for signing and promulgation as law. The new law is announced through the media and the President Office website (WTO, 2014).

Legal documents are collected from three main sources: (1) ministries' official archives; (2) the Official Gazette, which contains updated information on regulations; and (3) the Office of the Attorney General's extensive list of laws, Cabinet orders, and Cabinet and ministerial ordinances (Thein and Naing, 2017). Myanmar is building a trade portal, which will store all the country's trade-related regulations.

2.2. Comprehensiveness of Non-tariff Measures

Table 6.1 summarises the comprehensiveness of the data collection exercise conducted in 2018, which includes the update of regulations from 2016 to 2018 and the revision of earlier regulations in the 2015 database. Since Myanmar has not made any notifications to the WTO, the updated ERIA–UNCTAD (2019) NTM database is an extremely helpful reference for government officials, business, and trade negotiators on trade-related regulations in force.

There were almost twice as many coded regulations in 2018 as in 2015; the 88 coded regulations included new, amended, and revised ones. The use of trade-related regulations is increasing: the number of coded NTMs rose by approximately 40%, from 193 to 267. Three new agencies contributed to this increase: Union Parliament, Myanmar Investment Commission, and Supervision Committee for Motor Vehicle Importing. The last agency is under the Ministry of Commerce. They issued the Special Tax Law, Notification

No.15/2017 (listing restrictive investment activities), and Notification No. 1/2016 (setting the year of production of motor vehicles imported during 2017).

Table 6.1: Comprehensiveness of Non-tariff Measures, Myanmar, 2015 and 2018 (number, %)

Number	Comprehensiveness	Number	
		2010	2018
1	Total number of coded regulations	46	88
2	Total number of notifications (NTMs reported to WTO) ³	N/A	N/A
3	Total number of coded NTMs	193	267
4	(a) Total affected products (HS lines, national tariff lines), total number of affected products	10,813	10,813
	(b) Share of the number of affected products to the number of total products	100%	100%
5	Total number of issuing institutions	10	13

Source: Authors, based on ERIA-UNCTAD (2019).

3. Descriptive Statistics of Non-tariff Measures

3.1. By Regulatory Agency

Table 6.2 breaks down NTMs by issuing institution. Three observations are worth noting. First, the Ministry of Agriculture, Livestock and Irrigation was the most important agency dealing with NTMs, even though the share of NTMs it issued declined from 49% to 39%. Under its portfolio were SPS-related regulations specified in the Pesticide Law, Animal Health and Development Law, Marine Fisheries Law, Fish Farming Law, Plant Pest Quarantine Law, Aquaculture Law, National Food Law, and Seed Law.

Second, the share of NTMs under the Ministry of Commerce increased substantially. In 2015, only seven NTMs were in its portfolio. In 2018, remarkably, there were 64, making the ministry the second most important agency for NTM issues, accounting for one-fourth of total NTMs.

The Ministry of Commerce is responsible for drafting trade-related legislation and coordinating and implementing policy across government agencies. The increasing number of NTMs under the ministry may reflect the dynamics of trade reform, as the

³ Myanmar appointed national enquiry points to the WTO for all concerns related to TBT and SPS measures, but the WTO did not receive any notifications from the country (WTO, 2014).

economy integrates into the world. New ministry regulations include notifications on licensing for products in positive or negative lists; regulations on imports of heavy manufacturing products such as construction machinery and transport vehicles (cars, aircraft, motobikes); removal of import prohibition on certain agricultural products; and relaxation of trading rights for foreign-invested companies. In contrast to the common perception that NTMs restrict trade, some of these regulations liberalise trade by simplifying procedures and expanding the scope of products to be traded. However, other NTMs, such as the controversial policy on car imports, may burden enterprises.

Table 6.2: Incidence of Non-tariff Measures, by Issuing Institution, Myanmar, 2015 and 2018 (number, %)

No.	Issuing Institution	2015		2018	
		Number of NTMs	Share of NTMs (%)	Number of NTMs	Share of NTMs (%)
1	Ministry of Agriculture, Livestock and Irrigation	94	48.7	104	39.0
2	Ministry of Commerce	7	3.6	64	24.0
3	Ministry of Health and Sports	22	11.4	23	8.6
4	Ministry of Natural Resources and Environmental Conservation	21	10.9	21	7.9
5	Ministry of Home Affairs	16	8.3	16	6.0
6	State Peace and Development Council (SPDC)*	17	8.8	17	6.4
7	Ministry of Electricity and Energy	9	4.7	9	3.4
8	Ministry of Industry	4	2.1	6	2.2
9	Ministry of Transport and Communications	2	1.0	2	0.7
10	Ministry of Planning and Finance	1	0.5	2	0.7
11	Others	0	0.0	3	1.1
	Total	193	100.0	267	100.0

* Previously the State Law and Order Restoration Council (SLORC), renamed by the Adaptation of Expression Law, 1997 (SDPC Law No 1/97).

Source: Authors, based on ERIA–UNCTAD (2019).

Third, the number of NTMs issued by other regulatory agencies remained stable. In 2018, the Ministry of Health and Sports and the Ministry of Natural Resources and Environmental Conservation accounted for about 8% each of total NTMs; 12 regulatory agencies accounted for 20%.

3.2. Non-tariff Measures by Type

Table 6.3 shows three major findings. First, technical measures – SPS and TBT – were the most prominent type of NTMs in both years. SPS measures and TBT together accounted

for half of total NTMs in 2018. Most SPS measures are under the Ministry of Agriculture, Livestock and Irrigation through various laws and regulations with clear non-trade objectives.

Table 6.3: Incidence of Non-tariff Measures by Type, Myanmar, 2015 and 2018 (number, %)

Category	Issuing Institution	2015		2018	
		Number of NTMs	Share of NTMs (%)	Number of NTMs	Share of NTMs (%)
A	Sanitary and phytosanitary (SPS) measures	78	40.4	80	30.0
B	Technical barriers to trade (TBT)	33	17.1	51	19.1
C	Pre-shipment inspection and other formalities	2	1.0	6	2.2
E	Non-automatic import licensing, quotas, prohibitions, quantity-control measures, and restrictions other than SPS measures or TBT	21	10.9	36	13.5
F	Price control measures, including additional taxes and charges	14	7.3	20	7.5
G	Finance measures	0	0.0	3	1.1
H	Measures affecting competition	1	0.5	1	0.4
I	Trade-related investment measures	1	0.5	5	1.9
K	Restriction on post-sales services	0	0.0	0	0.0
L	Subsidies (excluding export subsidies under P7)	0	0.0	0	0.0
M	Government procurement restrictions	1	0.5	1	0.4
N	Intellectual property	0	0.0	0	0.0
P	Export related measures	42	21.8	64	24.0
	Total	193	100.0	267	100.0

NTM = non-tariff measure.

Note: NTM classification is based on the United Nations Conference on Trade and Development M4 NTM classification. The database does not cover measures under category D (contingent trade protective measures), J (distribution restrictions), and O (rules of origin).

Source: Authors, based on ERIA-UNCTAD (2019).

Regarding TBT, the top requirements include labelling and packaging, production and post-production, product quality and safety, and conformity assessment. TBT from the Ministry of Commerce focus on transport vehicles, machinery, construction materials, and petroleum products. The Ministry of Health maintains TBT on cosmetics, cigars and tobacco, medicines, and chemicals. Several regulations under the Ministry of Agriculture, Livestock and Irrigation also contain TBT, such as the regulation on new seed variety registration, Pesticide Law, National Food Law, and Fertiliser Law. SPS measures and TBT are legitimate tools to achieve public policy goals and are here to stay. Instead of eliminating them, their trade-restricting effects can be minimised by reducing procedural costs through good design and efficient implementation.

Second, in absolute terms, the number of NTMs either increased or remained unchanged in all sub-categories. The largest increase occurred in TBT (33 to 51), non-automatic import licensing and other quantitative restrictions (21 to 36), price controls (14 to 20), and export-related measures (42 to 64). The utilisation of non-technical measures, including those in categories C, E, and F, may require further justification. Most regulations containing C, E, or F measures are claimed to be used to protect the environment, animal and human health and safety, and security. However, the objectives are not always clear-cut.

For example, agriculture products subject to price controls are governed by the Ministry of Agriculture, Livestock and Irrigation under regulations for importing and exporting animals and animal products. Whilst these regulations cover virtually all meat products, including pork, beef, chicken, mutton, and horse, quarantine fees and health certificate fees apply to only some cases.

Third, export-related measures (P) constitute nearly one-fourth of total NTMs. Amongst export NTMs, licensing (P33) and SPS- and TBT-related export measures (P1) are the most widely used. Licensing affects a wide range of products, including animals, chemicals, food, minerals, machinery and electronics, and transportation. P1 measures do not cover heavy manufacturing goods.

Not all regulations restrict exports. Some facilitate trade by shortening the list of prohibited exports, such as Notification No. 62/2016 (Announcement on Amending Liberalised Commodities for Export), Notification No. 1/2011 (Prohibition for Export), and Notification No. 9/2018 (Export Negative List), all under the Ministry of Commerce.

Table 6.4: Top-10 Non-tariff Measures, Myanmar, 2015 and 2018 (number, %)

No.	NTM Type	NTM Description	2015		2018	
			Number of NTMs	Share of NTMs (%)	Number of NTMs	Share of NTMs (%)
1	E1	Non-automatic import-licensing procedures other than authorisations covered by sanitary and phytosanitary (SPS) and technical barriers to trade chapters	13	6.74	19	7.12
2	P33	Licensing, permit, or registration requirements to export	13	6.74	17	6.37
3	A83	Certification requirement	13	6.74	13	4.87
4	F61	Custom-inspection, -processing and -servicing fees	11	5.70	12	4.49
5	B7	Product-quality, -safety or -performance requirement	4	2.07	11	4.12
6	A64	Storage and transport conditions	10	5.18	10	3.75
7	A82	Testing requirement	8	4.15	8	3.00

No.	NTM Type	NTM Description	2015		2018	
			Number of NTMs	Share of NTMs (%)	Number of NTMs	Share of NTMs (%)
8	A86	Quarantine requirement	7	3.63	7	2.62
9	A14	Authorisation requirement for SPS reasons for importing certain products	4	2.07	6	2.25
10	A31	Labelling requirements	6	3.11	6	2.25

NTM = non-tariff measure, UNCTAD = United Nations Conference on Trade and Development.

Note: NTM classification is based on the UNCTAD M4 NTM classification. The database does not cover measures under categories D (contingent trade-protective measures), J (distribution restrictions), and O (rules of origin).

Source: Authors, based on ERIA-UNCTAD (2019).

Table 6.4 ranks the top-10 NTMs using more detailed classification. Consistent with the pattern in Table 6.3, SPS-related measures concerning conformity assessment (A8) dominate the list. Non-automatic licensing (for imports) and export licensing also make up a not-insignificant portion of all NTMs.

3.3. By Product

Since NTMs serve multiple purposes, their application varies across product categories. This section documents the pattern of NTM usage at the 2017 HS two-digit level. The discussion utilises three descriptive indicators of NTM incidence: frequency index, coverage ratio, and prevalence score. The frequency index measures the share of traded products affected by at least one NTM. The frequency index is easy to compute but does not reflect the importance of different products in the export or import basket. For example, if NTMs are applied to a small number of products, the frequency index is small. If trade is highly concentrated in a few key products, as in Myanmar, however, the effect of NTMs on trade can be large. The coverage ratio overcomes this shortage by measuring the share of trade value affected by at least one NTM, instead of counting the number of products. The prevalence score counts the average number of NTMs imposed on one traded product.

Exports

Figure 6.4 demonstrates the frequency index and Figure 6.5 the coverage ratio. Overall, exports in Myanmar have a high NTM incidence. In 2018, almost 100% of export products and nearly 90% of the export value were affected by at least one NTM. The coverage ratio was noticeably lower than the frequency index in chemicals, metals, minerals, plastic or rubber, machinery and electronics, transportation, and wood, reflecting less application of NTMs to more export-intensive products. The coverage ratio was equal to or larger than

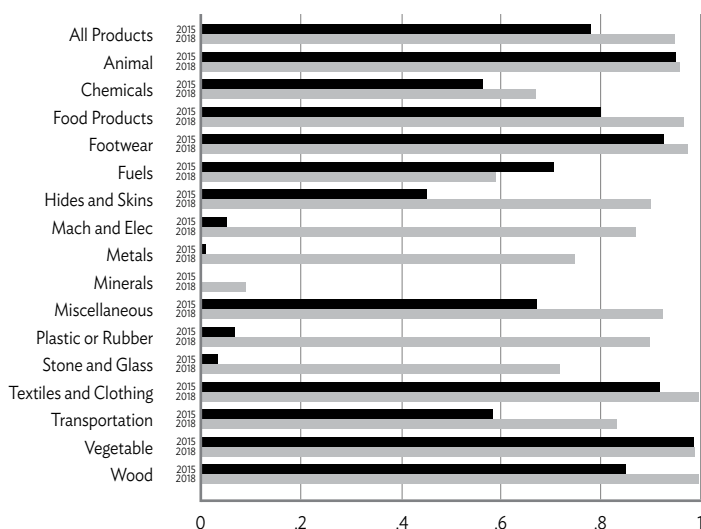
the frequency index in the agricultural sector, footwear and textiles, and fuels, implying greater application of NTMs to more exportable products.

The use of NTMs varied remarkably across sectors, particularly if trade value is considered. Minerals, metals, chemicals, and plastic and rubber were less regulated. The coverage ratio of minerals and metals were lower than 20%, whilst for chemicals, plastic and rubber it was around 30%. Heavy manufacturing products, such as transportation and machinery and electronics, were moderately regulated. Their coverage ratio was approximately 60%. The largest coverage ratios were for agricultural products, textile and footwear, fuels, and hides and skins, affecting over 90% of trade value. Agricultural products, textiles, and minerals were the top exports, which explains the large coverage ratio.

Sectors that saw the largest increase in NTM incidence were hides and skins, machinery and electronics, metals, plastic and rubber, stone and glass, and transportation. This rise corresponded to the strengthening of regulatory instruments with the passing of new regulations. These included, for example, notification on the export and import of gold, notification of the export positive list and liberalised commodities for exports, and the introduction of measures affecting trade in vehicles, including the trading rights of foreign-invested firms.

Figure 6.6 shows that each product was subject, on average, to two NTMs. Consistent with Figure 6.4 and Figure 6.5, agricultural products were subject to the largest number of NTMs, as SPS measures were widely used.

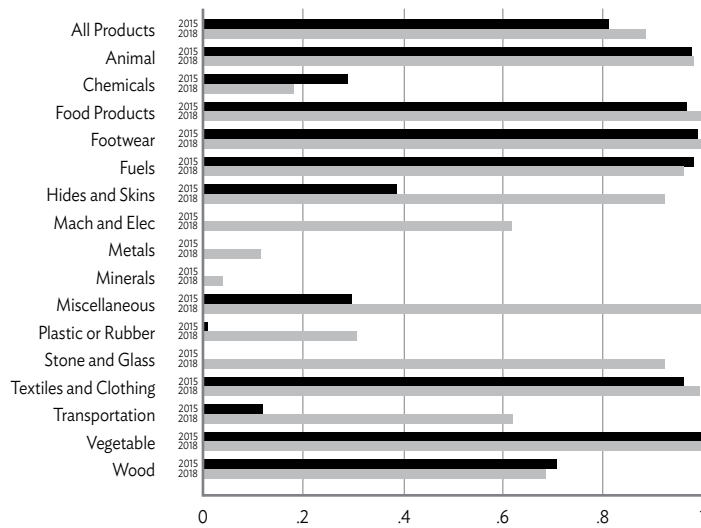
Figure 6.4: Frequency Index of Exports, Myanmar, 2015 and 2018



Note: Products with partial coverage are not included.

Source: United Nations Conference on Trade and Development calculations, based on UNCTAD-ERIA (2019).

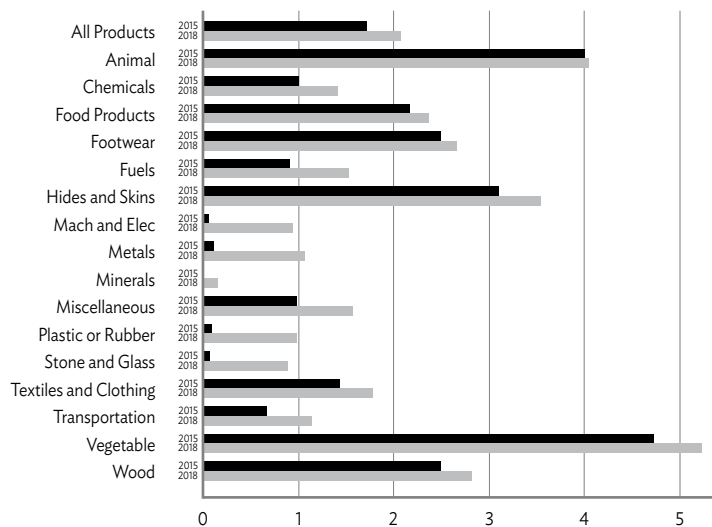
Figure 6.5: Coverage Ratio of Exports, Myanmar, 2015 and 2018



Note: The trade year used is based on the latest available import data at the HS 6-digit level from UN-COMTRADE (2019). Products with partial coverage are not included.

Source: United Nations Conference on Trade and Development calculations, based on UNCTAD-ERIA (2019).

Figure 6.6: Prevalence Score of Exports, Myanmar, 2015 and 2018



Notes: Products with partial coverage are not included.

Source: United Nations Conference on Trade and Development calculations, based on UNCTAD-ERIA (2019).

Imports

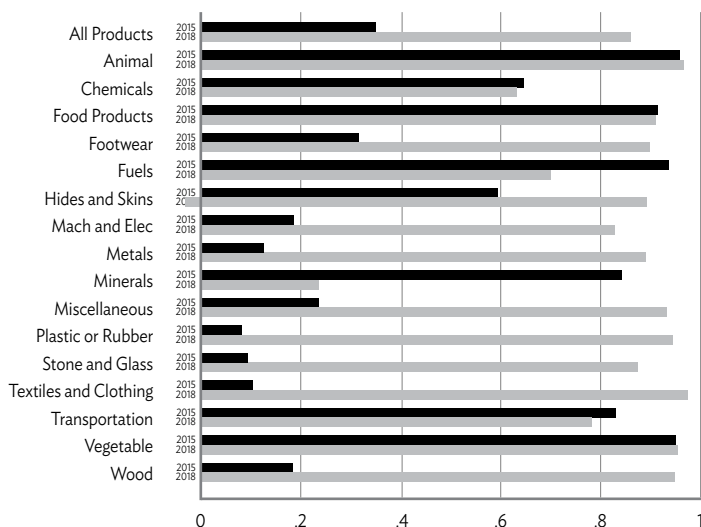
Figure 6.7 shows the frequency index of imports, and Figure 6.8 the coverage ratio. Imports are subject to high NTM incidence. In 2018, NTMs were imposed on nearly 90% of imports, measured by the number of tariff lines and by trade value. The frequency index and coverage

ratio were more or less equal in most sectors. Remarkable deviations from this pattern were in chemicals, fuels, and minerals, which had coverage ratios significantly higher than the frequency indices, which is consistent with the sectors being import-intensive.

As in the case of exports, an increase in NTM incidence amongst imports may be expected as a result of ongoing trade reform. Figure 6.7 shows that the frequency index more than doubled in 2015–2018, from around 40% to nearly 90%. The frequency index accelerated within 3 years in nine out of sixteen sectors. As a result, the coverage ratio rose from over 60% to 90% for almost all products. Animal, chemicals, food products and vegetable, however, experienced minor changes in the NTM prevalence. These sectors were heavily regulated in both years. In addition, for fuels and minerals, the decline in frequency index was not accompanied by a corresponding decrease in coverage ratio, probably because NTM in 2015 already covered more import-intensive fuel and mineral products. Transportation, on the contrary, exhibited a larger decline in coverage ratio compared to that in frequency index. Figure 6.9 implies that, based on the number of NTMs per product, agricultural products were heavily regulated under various SPS-related regulations.

New regulations to accelerate reform issued after 2015 covered a wide range of products, a significant portion of which were from the Ministry of Commerce. Some regulations were import-specific and targeted a narrow range of products, such as cars for showrooms, construction machinery, cosmetics, chemicals, and seeds. Other regulations applied to imports and exports, such as regulations on trade in petroleum and in gold. As with exports, a not-insignificant fraction of regulations aims to facilitate trade by permitting foreign firms to trade certain products or by shortening the import negative list.

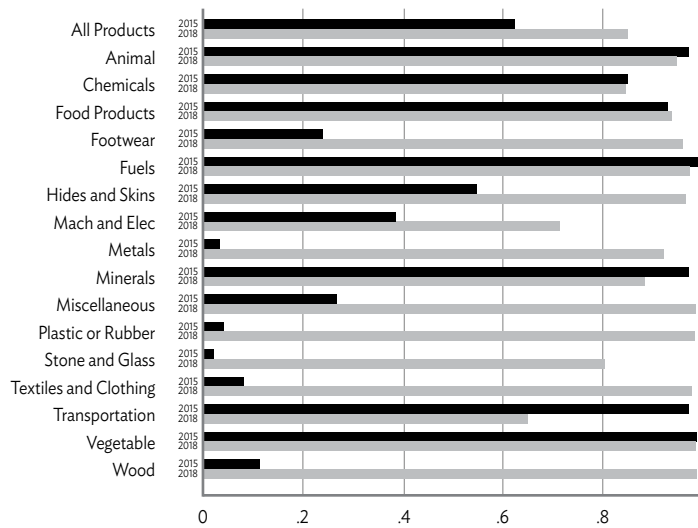
Figure 6.7: Frequency Index of Imports, Myanmar, 2015 and 2018



Notes: Products with partial coverage are not included.

Source: United Nations Conference on Trade and Development calculations, based on UNCTAD-ERIA (2019).

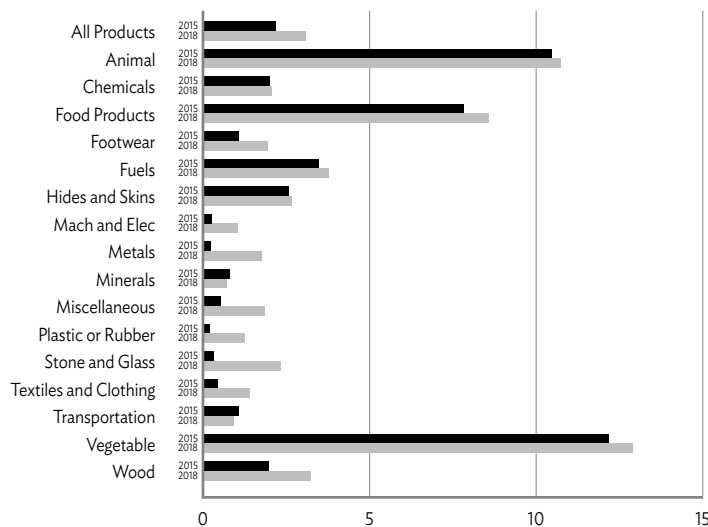
Figure 6.8: Coverage Ratio of Imports, Myanmar, 2015 and 2018



Notes: The trade year used is based on the latest available import data at the HS 6-digit level from UN-COMTRADE (2019). Products with partial coverage are not included.

Source: United Nations Conference on Trade and Development calculations, based on UNCTAD-ERIA (2019).

Figure 6.9: Prevalence Score of Imports, Myanmar, 2015 and 2018



Notes: Products with partial coverage are not included.

Source: United Nations Conference on Trade and Development calculations, based on UNCTAD-ERIA (2019).

4. Conclusion and Policy Recommendations

The study found the following. First, the number of NTMs increased significantly by type and product in 2015–2018: from 163 to 297, corresponding to an increase in number of trade-related regulations from 46 to 88. Contrary to the common perception that NTMs

restrict trade, some new regulations facilitate trade, reflecting the country's efforts to reintegrate into the global market after long political turmoil. The Ministry of Commerce is the focal point in drafting regulations and coordinating across line ministries.

Second, as in many countries, technical measures accounted for a large share of NTMs. SPS measures and TBT applied to imports together accounted for 50% of total NTMs in 2018. Most SPS-related measures are managed by the Ministry of Agriculture, Livestock and Irrigation. Agencies involved in TBT are the Ministry of Commerce; Ministry of Agriculture, Livestock and Irrigation; and Ministry of Health. SPS measures and TBT are legitimate tools to achieve public policy goals. Instead of eliminating them, the government should reduce procedural costs through good design and efficient implementation to minimise their trade-restricting effects.

Third, non-technical measures that are not encouraged under the WTO, such as price controls and non-automatic licensing, constitute a not-insignificant share of total NTMs. Non-automatic licensing is the most popular NTM. Whilst some measures aim to protect consumer and animal welfare, others do not have clear-cut objectives.

Fourth, exports and imports are highly regulated by NTMs. NTM incidence is particularly high for resource-based products, including agricultural products, fuels, and chemicals. As trade gradually expands, manufacturing sectors such as machinery and electronics, footwear, and textiles are subject to rising NTM incidence.

The increasing use of NTMs should be interpreted with a caveat. Neither the number of NTMs nor the indicators (section 3) reflect the measures' stringency. Two countries may apply the same NTM to the same product, but stringency depends on the standards they adopt. Regulatory agencies should apply international standards to their NTMs, particularly technical ones.

The database does not indicate whether a regulation or a measure is issued with protectionist intent. This report does not aim to distinguish between NTMs and non-tariff barriers, as it is impossible to do so. Such assessment requires comprehensive review and consultation with stakeholders, including the issuing agencies and the private sector.

Given the country's ongoing efforts to stimulate trade through regulatory reforms, the increasing use of NTMs is not necessarily alarming. As poor design and implementation could incur significant costs, however, good regulatory practice should be taken seriously. A good starting point for streamlining NTMs is to make them more transparent. A comprehensive NTM database must be used and maintained. Myanmar should complete the NTM section of the National Trade Repository and link it to the ASEAN Trade

Repository platform. Coordination amongst line ministries through the NTM focal points will help smoothen the work flow by ensuring coherent and consistent policymaking. Finally, consultation with the private sector on design and impact assessment would help identify bottlenecks and make policies more effective.

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