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Corrigendum

**MONITORING OF TRADE IN OZONE-DEPLETING SUBSTANCES AND
PREVENTING ILLEGAL TRADE IN OZONE-DEPLETING SUBSTANCES
(DECISION XIV/7)**

This corrigendum is issued to:

- **Replace Annex I with** the attachment.



United Nations Environment Programme

برنامج الأمم المتحدة للبيئة · 联合国环境规划署
PROGRAMME DES NATIONS UNIES POUR L'ENVIRONNEMENT · PROGRAMA DE LAS NACIONES UNIDAS PARA EL MEDIO AMBIENTE
ПРОГРАММА ОРГАНИЗАЦИИ ОБЪЕДИНЕННЫХ НАЦИЙ ПО ОКРУЖАЮЩЕЙ СРЕДЕ

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Annex I

REPORT FROM UNEP DTIE ON THE ACTIVITIES OF THE REGIONAL NETWORKS WITH REGARD TO MEANS OF COMBATTING ILLEGAL TRADE

1. Introduction

Decision XIV/7 which was agreed at the XIVth MOP in Rome in 2002 requests UNEP DTIE to report through the Executive Committee to the XVth MOP on the activities of UNEP regional networks with regard to means of combating illegal trade in ozone depleting substances. The objective of that request is to review the efforts made so far to combat illegal trade in ODS in different regions of the world and suggest how the regional networks could further act to prevent such illegal trade to develop in the future.

As it was shown in the Report of the Ozone Secretariat on illegal trade in ODS presented to the Parties at XXIIInd Meeting of the OEWG in July 2002¹, illegal trade has become one of the major obstacles in achieving smooth phase out of ODS in developing countries and CEITs. The report encouraged activities to be taken at national, regional and global scale aiming at improving the process of monitoring and control of ODS in order to avoid development of illegal trade. Among others, the report mentioned the need of enforcement of legislation dealing with ODS through investment in customs resources, including training and equipment and emphasised the important role of cooperation between enforcement authorities at national and regional level.

UNEP DTIE has been very active in that regard since 1997 when the Executive Committee approved the first regional workshop on monitoring and control of ODS conducted by UNEP. Later on, a number of actions have been undertaken by UNEP in the framework of Refrigerant Management Plans and other Projects financed by the Multilateral Fund and GEF. Recently, the actions of UNEP regional networks aimed at combating illegal trade in ODS have been significantly intensified due to establishment of a Compliance Assistance Programme (CAP) approved by the Executive Committee in 2002 and being presently implemented at the regional level. Improvement of monitoring and control of ODS is one of the key objectives of CAP.

¹ “Study on Monitoring of International Trade and Prevention of Illegal Trade in ODS, mixtures and products containing ODS” – document UNEP/OzL.Pro./WG.1/22/4 available from Ozone Secretariat website

2. Activities of the UNEP Regional Networks in regard to means of combating illegal trade in ODS

UNEP regional networks provide a platform for Ozone Officers from Article 5 countries to exchange experiences, develop their skills and tap the expertise of their peers in both developing and developed countries. Conducted at the regional level, the activities of the networks build up the Ozone Officers' skills for implementing and managing their national ODS phase-out.

Presently, there are 9 UNEP regional networks managed by the offices situated within particular regions:

- Latin America & Caribbean-South (10 A5 plus 2 A2 countries)
- Latin America & Caribbean-Central (10 A5 plus 2 A2 countries)
- Latin America & Caribbean-Caribbean (13 A5 plus 2 A2 countries)
- South East Asia & the Pacific (11 A5 plus 2 A2 countries)
- South Asia (11 A5 plus 2 A2 countries)
- Africa-English Speaking (26 A5 plus 1 A2 country)
- Africa-French Speaking (27 A5 plus 2 A2 countries)
- West Asia (12 A5 plus 2 A2 countries)
- Eastern Europe and Central Asia (10 A5 plus 5 A2 countries)

The UNEP offices hosting the networks are: Regional Office for Africa (ROA), Regional Office for Asia and the Pacific (ROAP), Regional Office for Latin America and the Caribbean (ROLAC) and Regional Office for West Asia (ROWA). The Interim Regional Network Coordinator for Eastern Europe and Central Asia is presently based in Paris.

Activities of the UNEP regional networks that assist in combating illegal trade in ODS in the relevant regions can be divided in the following three broad categories which will be briefly described below individually though it should be understood that they are closely interrelated:

- Facilitating implementation of national and regional customs training
- Networking and twinning
- Awareness raising

Activities described in this interim report cover the period 1 January 2002 - 31 May 2004.

2.1 Facilitating implementation of national and regional customs training

Appropriate training of customs officers and other stakeholders involved in monitoring and control of ODS should be considered the most important way to prevent illegal trade. Customs agencies and other enforcement bodies play an essential role in the effective monitoring and control of import/export licensing mechanisms, in the collection of import/export data, in the enforcement of ODS regulations and in the prevention of illegal trade.

The UNEP training programme for customs officers follows the "train-the-trainers" approach, which aims at ensuring sustainability of the training through development of national trainers. Phase I involves a "train-the-trainer" workshop. Once the national ODS import/export

licensing system is in place or ready to be put in place, and a Country Handbook on ODS legislation and import-export licensing system has been prepared, Phase I is conducted. The participants of “train-the-trainer” workshop to train the other customs officers and other stakeholders in Phase II of customs training which involve a number of national training workshops.

In some regions (Africa, South Asia, West Asia, Central and Eastern Europe) regional or sub-regional training workshops were held before starting customs training programmes in individual countries. UNEP also conducts regional workshops on ODS monitoring, licensing systems and Harmonised System Codes in Eastern Europe, CIS, Africa, Latin America and other regions.

Activities of the Regional Networks have helped to refine and improve national customs training courses in the following ways:

- The Customs training approach followed by UNEP has been extensively discussed during network meetings, and recommendations have been used as guidance to improve implementation of national customs training.
- National organisation of customs training has been improved through exchange of experiences between countries during network meetings and Custom-Ozone Officers meetings.
- Coordination meetings, especially on the cooperation between Customs and NOU have been conducted leading to actual agreements.
- Through the exchange of information on actual cases of seizures by customs in countries, the UNEP Customs Training Manual has been updated.
- Exchange of information on drafting the licensing system, especially those aspects related to enabling enforcement, e.g. information requested in different forms, reporting requirements, registration of importers/exporters, has improved the quality and accelerated the drafting in individual countries.
- Information exchange on the use of HS codes has also accelerated the introduction of licensing systems in individual countries, and promotes harmonisation of customs codes.
- Through the networks, contacts were made enabling experts from one country to assist other countries with implementation of customs training and/or drafting of legislation.

So far Phase I has been completed in 47 countries, and Phase II in 25 countries.

Customs training workshops not only provided the customs officers with tools needed to control ODS trade effectively, but also initiated routine communication between national stakeholders (in particular between environmental and customs authorities) – see « Networking and Twinning » section below, created the platform for discussion on improvements of national legislation and effective enforcement of regulations concerning monitoring and control of ODS trade, and allowed for development of awareness raising on the threat of illegal trade in ODS - see « Awareness Raising » section below. The UNEP regional offices through CAP actively participated in this process as their representatives took part in a number of workshops and later assisted the countries in implementation of recommendations developed at the workshops.

Recently, the concept of integrated customs training has been proposed by UNEP as a result of wide consultations at the regional networks level, and with MEA Secretariats, customs authorities, non-governmental organisations and experts. This concept is based on the assumption that there are similarities in the approaches that must be taken by the customs officers in control of trade related to environmental conventions (Montreal Protocol, Basel Convention, Rotterdam Convention and CITES) and that it might be more effective to let the customs officers be acquainted with problems regarding the enforcement of all those major treaties at just one joint course rather than organise separate training workshops. It includes the organisation of national and regional integrated training workshops when possible, preparation of integrated training materials where appropriate; and the development of links between existing web sites of MEA Secretariats.

On 2nd of June 2003, the “Green Customs” website was launched. It is supported by the World Customs Organization (WCO), Interpol, CITES, the Basel Convention and UNEP DTIE's OzonAction Programme and offers information and training materials for customs officials to combat illegal trade in commodities of environmental concern. A pool of highly qualified trainers has been identified, which will constitute a task force to be deployed at each integrated training session. Their skills will be further strengthened through participation in the WCO's Fellowship Programme. Additional trainers will be added to meet future demand.

Future Plans include the development of a common agenda under integrated training, the development of special training modules; compilation of manuals, the development of distance and internet learning techniques for integrated training, drawing on the experiences of the World Customs Organization and CITES. A compliance and enforcement manual is also being developed which will be used to train enforcement personnel, including Customs officials.

The standard agenda of UNEP train-the-trainer workshops for customs officers on monitoring and control of ODS contains a presentation on trade-related elements of the other conventions helping customs officers to understand all relevant similarities and synergies. The idea of « green » customs training is discussed at regional workshops and meetings of ozone officers and customs officers (see « Networking and Twinning » section below).

2.2 Networking and Twinning

Networking and twinning, creating formal and informal links and improving collection and exchange of information between the relevant countries, are undoubtedly activities of the UNEP Regional Networks, which receive priority status. While networking concerns a large number of countries, which are encouraged to collaborate in certain areas, twinning involves initiating closer relationships between limited numbers of countries or stakeholders, which have common problems to solve. The crucial role networking and twinning play in preventing and combating illegal trade in ODS on regional and national scale is inevitable since a better understanding of the situation of other countries in the region with regard to monitoring and control of ODS trade and the possibility to take joint actions against illegal traders strengthen the capability of an individual country to deal with that problem.

The Regional Office for Asia and the Pacific (ROAP) is quite unique in that they have an ongoing Swedish bilateral project covering both the South Asia and South East Asia and the Pacific network countries. Sweden submitted and received approval for a bilateral project, to

promote further regional co-operation for the control of trans-boundary movements of ODS in the SEAP network countries, from the Executive Committee of the Multilateral Fund at its 34th Meeting in July 2001. The Executive Committee of the Montreal Protocol approved at its 39th Meeting, the project “Preventing Illegal Trade of ODS in the South Asia Region” as an extension of the SEAP project. The project uses the framework of the Regional Networks to develop practical cooperation between customs and ODS officers in the region. The project aims at involving customs officers in the cooperation between ozone officers in the region, developing the necessary framework for a continuous regional and national cooperation on monitoring and control of ODS trade, gathering and disseminating information for development of risk profiles, and developing enforcement tools.

A summary of those and other activities of UNEP Regional Networks in the field of networking and twinning is presented in Table 1.

TABLE 1

Summary and some examples of the activities of UNEP Regional Networks in the area of Networking and Twinning undertaken between 1 January 2002 and 31 May 2004

	Activity	Status of practical implementation	Actual effect with regard to combating illegal trade
1	Organising joint workshops for customs/ozone officers from the countries of the region with participation of representatives of relevant international institutions (RILO, WCO, Interpol) and NGOs (EIA) and including illegal trade in ODS in the agendas of routine network meetings of ozone officers	ROA: 4 sub-regional workshops planned in 2004 – ROAP: 4 regional workshops organised (Chiang Mai – 2002, Phuket – 2002 and 2003, Agra - 2004) ROWA: 1 regional workshop organised in 2003 (Damascus) Eastern and Central European Countries: 1 regional workshop organised in 2004 in Budapest All networks: illegal trade in ODS was put in the agenda of network meetings of ozone officers	<ul style="list-style-type: none"> - Development of important recommendations for actions aimed at combating illegal trade (see items 2-6 in this table for results) - Initiating routine contacts on ODS between customs officers in different countries of the region - Exchanging information between customs and ozone units from different countries in the region on approaches taken to address problem of illegal trade - Linking national initiatives on enforcement to regional cooperation - Initiating formal agreements between customs and NOUs; such agreements have been established in Philippines, Thailand, Fiji and Malaysia - Raising awareness of and increase cooperation with the international institutions and NGOs dealing with illegal trade on region-specific problems related to trade in ODS - Creating opportunity for the countries to implement special enforcement tools and understand better the international approach to illegal trade in ODS based on information presented by experts invited to the workshops <p><u>Examples:</u></p> <ul style="list-style-type: none"> - Data Mining Int. Co with support from US DOJ offered to provide the software related to ODS trade risk profiling (Numerically Integrated Risk Profiling System) for free to developing countries in the Asia Region based on their interest. UNEP will facilitate the introduction of such software as part of activities implemented under the Swedish bilateral project (ROAP) - Yemen Customs presentation on their computer-operated risk profile system at the workshop in Damascus in 2004 (ROWA) - RILO presentation at Customs-Ozone Officers Coordination Workshops on their Modus Operandi used in tracking illegal ODS shipments, and increased involvement of countries in the Region to use RILO facilities for exchange of information on ODS, to be disseminated

	Activity	Status of practical implementation	Actual effect with regard to combating illegal trade
			<p>by RILO through the designated National Contact Point (NCP) (ROAP).</p> <ul style="list-style-type: none"> - Offer by EIA to assist countries in the in the areas of investigating assistance, compilation of information, improvement of enforcement regimes and training, noting that it is up to individual countries to contact EIA directly to initiate such cooperation (ROAP)
2	Organising joint workshops for customs/ozone officers from the neighbouring countries (twinning)	<p>ROAP: two meetings organised in 2003; Mongolia Dialogue (Mongolia, China, Japan) and Nepal Dialogue (Nepal, China, India)</p> <p>ROWA: customs officer from Yemen participated in train-the-trainer workshop in Kuwait</p>	<ul style="list-style-type: none"> - Task Force to deal with illegal trade in ODS on China-Mongolia border formed from representatives of appropriate institutions in both countries. Task Force is to find solution to, <i>inter alia</i>, the problem of labelling ODS containers only in Chinese - Agreement on including ODS in the agenda of routine meetings of customs of Nepal and China and Nepal and India on the border and on establishing one customs officer in each country for contacts regarding illegal trade in ODS (formal approval from China is pending) - Yemen customs authorities could learn about enforcement of licensing system in Kuwait and Kuwait customs could benefit learning about ESCODA system of customs alerting developed and used in Yemen
3	Collecting and analysing quantitative data on trade in ODS in countries from the region	<p>ROAP</p> <ul style="list-style-type: none"> - Relevant Desk Study completed and results presented to the countries and discussed at the workshop in Agra (2004) - EIA presented an analysis of discrepancies between import and export data between countries 	<ul style="list-style-type: none"> - Confirmation of the routes of illegal ODS traffic will help the countries concerned to find its sources and destinations - Enables countries to be aware and analyse discrepancies between import and export data between two countries
4	Initiating and facilitating small group country consultations (twinning)	<p>ROAP - Consultations between selected countries in the region on illegal trade in ODS were held at the workshop for customs/ozone officers in Agra (2004):</p> <ul style="list-style-type: none"> - China and Philippines - China and Sri Lanka - China, Indonesia and EIA - India, Indonesia and EIA - India and Bangladesh - Fiji and Japan <ul style="list-style-type: none"> - Pakistan, Iran and Afghanistan - India and the Philippines 	<p>Problems related to illegal trade in ODS going on between countries in the region could be dealt with more effectively</p>

	Activity	Status of practical implementation	Actual effect with regard to combating illegal trade
5	Organising joint workshops for industry, customs and ozone officers	ROAP: 1 workshop organised in 2004 (Hua Hin); participants included industry and government representatives from China, India, the European Union, Russia, the World Bank, the Environmental Investigation Agency and the Stockholm Environment Institute	ODS producers in the region declared assistance in the process of combating illegal trade and concrete proposals were made in that respect what will help much in combating illegal trade
6	Establishing internet discussion fora for customs and ozone officers	ROAP: relevant E-Forum established in 2003	Exchange of information on trade in ODS between the countries in the region was facilitated Example: solution to the problem of trade in used ODS-containing equipment discussed between Fiji and Japan with assistance of the E-Forum
7	Assisting in development of elements of National Action Plans dealing with enforcement of legislation related to monitoring and control of ODS trade	ROAP: establishment of Policy and Enforcement Centre was proposed in National CFC Phase-out Plan developed for Iran and Sri Lanka. One of the substantial tasks of the Centre will be monitoring of illegal trade in ODS and finding solutions to prevent it	Institutional capability of the countries to deal with the problem of illegal trade in ODS will be distinctly increased
8	Acting as liaison for the countries with regard to bilateral problems of illegal trade in ODS	ROAP: played that role in discussions between Japan and Vietnam on CFCs suspected to be illegally imported ROWA/ROLAC : played that role in discussions between countries in the region	Discussion between interested countries was facilitated, concrete problem could be clarified quickly More attention and seriousness given by NOUs to follow-up with other countries directly and/or through CAP on illegal trade cases.
9	Participating in other related regional and international meetings and events	ROWA: presented the issue of illegal trade in ODS the regional meeting for Customs Directors	New channels for information exchange on ODS trade opened through cooperation with customs directors.

2.3 Awareness Raising

Raising awareness of the general public and of the targeted groups (customs, industry, NGOs) on the problem of illegal trade in ODS is very important for achieving success in solving it both on the regional and national scale. While it should be understood that the activities of UNEP Regional Networks described earlier in this report also contained substantial elements of awareness raising and it is not necessary to repeat them here, the following activities which have not been mentioned before should be especially emphasised:

- Requesting the countries where the customs train-the-trainers workshops were organised to ensure proper media coverage of the objectives and outputs of the workshops, so general public could learn about the problem of illegal trade in ODS (examples: executed at all train-the-trainers workshops).
- Actively disseminating information on cases of illegal trade in particular regions and requesting the countries to present such cases in the workshops and meetings (examples: detailed information of the case of illegal trade in CFC-12 under the name of HFC-134 found in Philippines was widely distributed by e-mail by ROAP and presented at a number of meetings and workshops, cases of illegal trade were reported by representative of China to SA Network cases of illegal trade in ODS reported by Suriname were distributed by ROLAC to all countries in the network and to UNEP DTIE)
- Producing information sheets facilitating recognition of the illegal shipments by the customs and license-issuing institutions (example: ROAP drafted the format of information sheets showing legitimate importers and exporters in the countries in the region, collected the relevant information from the countries and disseminated that information to all countries in the region through the Customs-Ozone Officers Coordination Workshop).
- Collecting information on legislation on monitoring and control of ODS from the countries in the region and disseminating it to all countries (example: ROAP, ROWA).
- Drafting concise leaflets containing useful information facilitating identification of ODS shipments by customs and other relevant stakeholders (example: Customs Quick Reference Tool drafted by ROWA and then disseminated to all countries through the Regional Network Coordinators).
- Developing the on-line image bank of photos related to illegal trade in ODS as a handy reference for customs officers to help them recognise illegal shipments (work is ongoing in ROLAC).
- Explaining the issue of illegal trade in ODS to the regional trade and political organisations which can then include it in their work programmes (examples: collaboration in that regard between ROLAC and CARICOM and ROWA and the Arab League).

3. **Assessment of impact of UNEP Regional Networking activities on institutional and legal capability of countries to prevent and combat illegal trade in ODS**

Assessment of impact of UNEP Regional Networking activities on institutional and legal capability of countries to prevent and combat illegal trade in ODS was done through:

- Drafting and sending out a relevant questionnaire to the countries where the process of creating the infrastructure needed to combat illegal trade has already started (countries where both Phases or at least Phase I of customs training programmes has been completed).
- Visits to selected A5 countries to interview customs officers working at customs posts and also customs and environmental authorities (and other stakeholders, if appropriate) in order to collect the views of the key players directly involved in monitoring and control of trade in ODS on how they see the actual impact of UNEP activities on their country's and their own personal capability to deal with illegal trade in practice.

The assessment presented below is based on the responses of the countries to the questionnaire and on the views of the officers directly interviewed. Opinions of the countries in that regard presented at the workshops and meetings were also taken into account.

Real impact of customs training programmes² implemented with active participation of UNEP Regional Networks on increasing practical capability of the country to combat illegal trade was considered by all respondents and interviewed officers as inevitable. They all emphasised that the lessons learnt at the train-the-trainers workshops had significant impact on enforcement of ODS monitoring and control since it allowed the countries to improve in practice the process of issuing licences/permits/quotas, monitoring the actual use of permits and also to make the communication between customs and ozone officers much easier. Most of the respondents confirmed that the legislation dealing with ODS was amended based on the recommendations developed at the workshops. Certain countries where Phase II of training has been completed or is ongoing (Bahrain, Uzbekistan) reported that the number of cases of illegal trade in ODS spotted by the customs significantly increased while the others did not see any such increase. Some of the countries also confirmed that the NOUs were informed by the customs on using ODS identifiers that were distributed – one country (Uzbekistan) reported up to 50 attempts of illegal trade in ODS that were stopped in one year only due to the proper use of ODS identifiers.

Direct strong positive impact of other UNEP Regional Network activities (mainly comprising regional joint workshops for customs/ozone officers and meetings with participation of customs officers) on the communication on ODS between the corresponding environmental and customs agencies and also on internal communication inside the customs in the countries of the investigated regions (in particular between neighbours) was fully proved by the responses to the questionnaire and by the interviews. Some countries confirmed that the improvement was possible only because of the activities of the relevant UNEP Regional Network (ROLAC - Jamaica, Trinidad & Tobago) and UNEP DTIE (Uzbekistan) and almost all other countries reported that the said improvement was possible partly due to UNEP Regional Networks activities.

² Following the request contained in Decision XIV/7 separate evaluation of the effectiveness of customs training projects financed by the MLF in the framework of the National Refrigerant Management Plans is presently carried out. Impact assessment presented in this report is focused on the role of UNEP Regional Networks and does not intend to concur with that evaluation.

All countries confirmed that the improved communication with their neighbours, thanks to the UNEP activities in the region helped them very much in dealing with illegal trade in ODS.

A good example was given by Uzbekistan – only due to the links forged between the Uzbekistan NOU and Environmental Authorities in Russian Federation since the Regional Workshop for NIS countries organised by UNEP, the shipment of 6 tonnes of CTC falsely declared as recycled could be stopped. Some countries reported that due to the activities of UNEP Regional Networks the formal agreements on establishment of common strategies for combating illegal trade might be concluded between the countries in certain regions (e.g. Colombia and Venezuela – ROLAC, Pakistan, Iran and Afghanistan - ROAP).

Some countries listed the possible future activities of UNEP Regional Networks (or UNEP DTIE if there was no network established in the particular region) which would help them in combating illegal trade in ODS. Tajikistan requests UNEP assistance in facilitating contacts with China and Afghanistan, which are its neighbours, to develop an agreement on preventing the illegal ODS traffic occurring on Tajikistan borders with those two countries. Moldova would like to seek UNEP's help in establishing a framework for information exchange between producers/sellers of ODS and between importing/exporting countries. Uzbekistan suggests that UNEP could assist in creating a regional system of notification of customs and environmental authorities on ODS transfers and arrangement of convoying the ODS shipments to avoid partial unloading on the way through a transit country. All Central Asian countries would welcome establishment of the new UNEP Regional Network of Ozone Officers in that region. Trinidad & Tobago requests ROLAC to create an opportunity for more frequent direct contacts between officers from the Region dealing with enforcement of regulations related to ODS monitoring and control and to assist in the development of a system of exchange of information on ODS trade between countries in the region.

4. Recommendations and Lessons Learnt

This is summarised in the form of the following table:

	Lessons learnt	Recommendations
1	The countries see customs training as substantial for improving their legal and institutional capability to combat illegal trade. However, implementation of Phase II of training is delayed in many countries and has been completed only in few countries. Moreover, lack of follow-up with the officers trained in Phase II may result in loosing their skills and knowledge needed for effective monitoring and control of trade in ODS	<p>Countries where the customs training has not yet been started should be identified and establishment of relevant programmes initiated in the framework of projects to be financed by MLF or GEF.</p> <p>Reasons for delays in implementation of Phase II of the training in the countries where Phase I has been completed should be identified and ways found to speed up the process of customs training where it has already been started.</p> <p>The progress of implementation of customs training programmes should be monitored more closely, ensuring that Phase II begins right after Phase I is completed and that the ODS identifiers supplied to the countries reach the customs posts</p> <p>Sustainability of the training should be ensured through organization of refresher courses for the officers trained in Phase II, aimed at checking customs documentation dealing with ODS, practical identification of ODS and learning on methods of illegal trade in ODS.</p>
2	The customs and other officers (customs brokers, standards officers) involved in checking the customs documentation and doing physical examination of merchandise on the border will never be able to spot ODS illegal traffic unless they are warned that a particular kind of shipment needs special attention. Lack of “customs alerting” or “risk profiling” systems available at customs posts is the reason that the number of cases/attempts of illegal trade in ODS is quite low as compared to the estimated level of that illegal traffic	<p>“Customs alerting” or “risk profiling” computer systems and routine ways of transfer of information on specified types of shipments (based on specific customs codes, specific chemical/trade/company names, too low unit prices etc) from customs to NOU or licence-issuing authorities in the country should be established in order to discover illegal trade cases. In countries where no computers are available at customs posts, passing of such shipments through the “red line” should be mandatory. Customs Quick Reference Tool developed by UNEP ROWA should reach all customs posts in developing countries and be readily available for each customs officer.</p>
3	The idea of “green” (integrated) customs training disseminated through the Regional Networks received positive responses from the countries, but proper design of the training curriculum (duration, technical content, participants composition) will be a key to successful implementation.	The future work plan for Integrated Customs Training should be implemented quickly.
4	Activities of UNEP Regional networks aimed at networking and twinning the countries of particular regions (joint customs/ozone officers workshops, meetings with participation of ozone officers, bilateral meetings and consultations) with the objective to improve their capability to solve problems related to illegal trade in ODS appeared to be greatly appreciated by the countries and	To make the networking and twinning activities aimed at preventing and combating illegal trade in ODS in the regions more effective, extra financing sources, similar to the Swedish bilateral project in ROAP are necessary.

	Lessons learnt	Recommendations
	<p>resulted in concrete outcomes assisting the countries in preventing and combating illegal trade (e.g. formation of joint Task Forces or Enforcement Centres to deal with illegal trade, signing agreements between customs and NOU). However, it was observed that only if sufficient extra-financing has been provided (ROAP – relevant projects supported by Sweden) all activities that were necessary could be implemented with good results.</p>	
5	<p>Different activities have been initiated / tried in different Regions. While some of these activities are Region specific, others may be transferred to other Regions or could be implemented on the global level.</p>	<p>Based on the experience gained in the past two years, a global strategy / follow-up plan should be developed, indicating both the activities at the global and regional level.</p>
6	<p>Involvement of industry in the process of combating illegal trade initiated by ROAP through the joint workshop helped much in recognising the sources and destinations of illegal trade in ODS in the region. However, dialogue with ODS producers, importers and exporters in that respect has not been started in the other regions.</p>	<p>Facilitating a direct dialogue at the regional level between environmental and customs authorities and ODS producers, legitimate ODS importers and exporters (and possibly also ODS users - enterprises and refrigeration associations) to develop plans for joint efforts to prevent and combat illegal trade should be initiated.</p>
7	<p>All countries indicated the important role of UNEP as facilitator in communication and information exchange between the countries in the particular region on problems related to illegal trade in ODS and confirmed that this led to significant improvements in that regard.</p>	<p>The role of regional networks as facilitators of communication and information exchange between the countries in the region on problems related to monitoring and control of ODS, including attempts and cases of illegal trade, should be strengthened.</p>
8	<p>ROAP initiative to collect and analyse data on import and export of ODS in the countries in the region (and collaborating with developed countries) resulted in valuable conclusions related to possible illegal trade activities going on. Other organisations such as RILO and EIA used the regional networks as a forum to collect, analyse and disseminate such information. Drafting of information sheets containing list of legitimate importers/exporters and possibly also information on ODS actually licensed/ traded was an initiative that should help much in preventing illegal trade. However, not all countries contributed with data.</p>	<p>This initiative should be followed in other Regional Networks. Countries should be encouraged to contribute with data and, in consultation with UNEP DTIE, develop a system of sharing that information between the regional networks and countries in the regions where there is no network established.</p>
9	<p>Very positive response received from all Regional Networks to the initiative of ROWA (as a result of recommendations developed at the regional workshop) to a draft leaflet which contains information for customs to identify ODS shipments (Customs Quick Reference Tool). This shows that there is still room for awareness raising initiatives to be undertaken by Regional Networks.</p>	<p>Development of actions aiming at raising awareness of general public and target groups (e.g. customs, ODS users) on illegal trade in ODS should be foreseen.</p>

	Lessons learnt	Recommendations
10	Countries from the region where no UNEP Regional Network has been established (NIS countries in Central Asia) express their willingness to have such network created and emphasise the essential role the activities in the framework of that network would have in combating illegal trade.	In view of the importance of Central Asia with regard to potential threat of development of illegal trade in ODS in that region, the possibility of applying to GEF for financing the relevant project should be considered.
11	Networking combined with the establishment of CAP has improved the positive synergies between activities implemented under both, as the networks provide a useful tool to exchange information, discuss and obtain feedback on implementation of CAP activities. As such it increased the efficiency of other CAP activities on prevention of illegal trade, including national customs training projects.	Networks should increasingly be used to enhance positive synergies between different activities to prevent illegal trade.
12	Through the networks, specialised organisations such as RILO and EIA have found a forum to assist countries to prevent illegal trade. Their participation also provides a link to an integrated approach, which is promoted by UNEP through the Green Customs initiative. Participation of Article 2 countries in the Regional Networks is of crucial importance.	Regional/global organisations that focus their activities on prevention of illegal trade should be identified and invited to participate in the networks. Networks should focus in their discussions on the concrete support / role of those organisations, both within and outside the networks, so as to avoid general presentations.

5. Follow-up Action Plan

The last two years may be considered as an intensive learning period in which the CAP team, both in the Paris office and the Regional Offices, through networking were able to make countries aware of the threat of illegal trade and discuss intensively with countries on actions to prevent illegal trade. The Swedish bilateral project on prevention of illegal trade in SEAP and SA networks was particularly effective in this regard. It enabled the CAP team in ROAP to make quick progress in the development of information exchange on illegal trade cases, analysis of ways to prevent it, increase bilateral cooperation between countries to solve specific cases, and to introduce management tools such as risk profiling to enhance the national capacity of countries to prevent illegal trade. Intensive cooperation with both RILO/AP and EIA during the implementation of the Swedish project provided much needed experience and tools to enhance the capacity of countries.

It is also clear from the experience gained in the past two years that, although the main strategy includes similar tools, each Region also has its own specificities. Each CAP team in the Regional Offices was able to identify those particularities in an efficient way, and they will need to be addressed when developing a more focussed global and regional approach.

One positive side effect of the introduction of CAP in which project implementation is done on a regional level is the possibility for the regional CAP teams to integrate the different CAP activities to make them more effective. The networks have provided a platform for countries to give immediate feedback on implementation of Customs training, but also provided their views on how activities related to enforcement in National Phase-out Plans can be directly linked to the regional activities, providing advice to countries on the implementation.

Networking enabled countries to have a broader view of the problem of illegal trade and made suggestions to the Meeting of the Parties on how, based on their experience certain issues such as transit trade may be better controlled. Here also, the networking was crucial in enabling the countries to directly discuss with exporting countries on how to control the problem. The continued participation of Article 2 countries as members of the Regional Networks is crucial for the success.

Based on the experience gained in the last two years, UNEP is developing a follow-up Action Plan. The following elements are being considered:

- Identify the activities that have been successful in the last two years, in the different Regions, and decide on which should be implemented globally through the regional networks and which are specific to the Region.
- Identify the Regional/International Organisations working on combating illegal trade and involve them actively in the networking activities, as well as in other activities related to combating illegal trade.
- Analyse cases where industry (including producers, importers, exporters and users of ODS) played a very active role in detection and investigating illegal ODS-trade and develop a model of industry involvement based on national cases (e.g. India) and the conclusions of the Hua Hin ROAP workshop.

- Identify how networks should increasingly be used to enhance positive synergies between different activities to prevent illegal trade.
- Consider possibility of including the establishment of “customs alerting” or “risk profiling” computer systems in the customs check points in countries which already have computerised customs control in the framework of existing RMPs or through bilateral projects .
- Ensure the sustainability of customs training through organization of “refresher” courses for the officers trained in monitoring and control of ODS in Phase II.
- Take forward the work plan of the Green Customs Initiative, through increased cooperation with the involved organisations.
- Identify the role of Regional Political Organisations and include illegal trade on their agenda, so as to increase political awareness.
- Identify the problems related to seizing of goods, both with regard to compliance and on how to deal with seized goods, and bring them to the attention of the MOP.
- Increase cooperation between countries in a very practical way, complementing the ongoing activities in information exchange.