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环境规划署

Distr.  
LIMITED

UNEP/OzL.Pro/ExCom/44/12  
1 November 2004

CHINESE  
ORIGINAL: ENGLISH

执行蒙特利尔议定书  
多边基金执行委员会  
第四十四次会议  
2004年11月29日至12月3日，布拉格

## 关于海关官员培训项目与许可证制度项目评价的案头研究

为节省经费起见，本文件印数有限。请各代表携带文件到会，不索取更多副本。

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- 附件一 项目完成报告中的信息
  - 一 a 许可证项目
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- 附件六 环境规划署结合第一期和第二期海关培训的新方法

## 一、背景和目标

1. 缔约方第十四次会议请求环境规划署/技工经司根据第 XIV/7 号决定通过执行委员会向缔约方第十六次会议报告关于打击非法贸易手段的区域性网络活动情况。还请求执行委员会作为优先事项，考虑对海关官员培训项目和许可证制度项目进行评价，可能时向缔约方第十六次会议提出报告。执行委员会响应该项决定，决定在第四十三次会议上将环境规划署/技工经司关于打击非法贸易手段的区域性网络活动（业经修正和更新的 UNEP/OzL.Pro/ExCom/43/58/Corr.1 号文件第一部分第 1、2 节）报告转交给缔约方第十六次会议，并报告委员会将对即将向缔约方第十七次会议报告的海关官员培训项目和许可证制度项目进行重新评价的情况。
2. 2002 年 6 月，不限成员名额工作组第二十二次会议讨论了根据缔约方第十三次会议第 XIII/12 号决定编制的关于“监测国际贸易和防止消耗臭氧层物质、包含消耗臭氧层物质的混合物与产品非法贸易”的广泛研究报告（UNEP/OzL.Pro/WG.1/22/4）。该项研究全面分析了消耗臭氧层物质非法贸易问题并提出了若干行动建议，这特别导致提出请求进行这次评价。该决定反映了一个问题：成功淘汰大部分消耗臭氧层物质的消费和生产的局面，可能会因日益增加的消耗臭氧层物质非法贸易而部分受到损害。
3. 1997 年在缔约方第九次会议通过的《蒙特利尔议定书》的《蒙特利尔修正案》第 4B 条第 1 款规定，到 2000 年 1 月 1 日或从生效日期起 3 个月内，所有缔约方应建立和执行附件 A、B、C 和 E 中新、旧、回收和再生的受控物质进口和出口许可证制度。尽管该修正案于 1999 年 11 月 10 日生效，但尚有 59 个国家未予以批准，86 个国家已批准该修正案。
4. 2000 年 7 月，执行委员会第 31/48 号决定将低消费量国家的制冷剂管理计划供资标准比原定供资标准增加了 50%，条件是这些计划包括受援国承诺将条例和法规编制列入计划，并将编制新的制冷剂管理计划的供资金额翻番，从而有助于为以后制冷剂管理计划一旦得到批准而加速执行创造前提条件。许可证制度的制定（至少以草案形式）是海关培训的先决条件。
5. 此外，执行委员会第 43/37 号决定为编制许可证制度提供了进一步动力，因为它把下述要求确认为额外供资的先决条件，以支持低消费量国家和极低消费量国家的体制建设：即一）国家指派一位全职官员管理臭氧机构，和二）管制消耗臭氧层物质进口的国家许可证制度业已制定。
6. 海关培训项目的执行和进口许可证制度的采用通常记入进度报告、项目完成报告和各自的执行机构记录。如果发生海关培训项目有重大的执行延迟情况，则其对增进进口管制方面的影响却很少有记载。
7. 本案头研究报告的目的是准备实地访问、使执行机构和双边机构参与评价准备，并取得执行委员会对所建议的评价问题和方法所作的反馈。最终评价报告草案按计划将呈递给

执行委员会第四十五次会议进行讨论，必要时在 2005 年 7 月提交给不限成员名额工作组之前对最终评价报告加以修正。

8. 在编制案头研究报告时，高级监测和评价官员与两位顾问审查了项目文件、秘书处的评价、项目完成报告、讲习班报告、培训手册等，以确认项目结果和影响，以及由此产生的评价问题以供进一步分析。另外，对罗马尼亚和塞内加尔进行实地访问了，两国报告一经要求即可获得，亦可自秘书处内联网网站获取。这些访问的调查结果概要已载入附件四。已收到澳大利亚、加拿大、波兰、瑞典、开发计划署、环境规划署和工发组织对草案的意见，这些意见将在本文件最终定稿时加以考虑。

## 二、许可证制度

### a) 综述

9. 消耗臭氧层物质进口许可证和海关培训活动首先作为独立项目和区域项目供资。近三、四年来，这类项目有显著增加，并且将这些活动从作为独立项目供资转向将其纳入制冷剂管理计划（制冷剂管理计划及其修订计划）、制冷维修行业计划和国家淘汰计划。包括许可证制度的大多数项目还有其他部分（消耗臭氧层物质进口商注册、监测系统、配额制度、海关官员培训、建立协会、鼓励良好做法等）。只有 12 个项目支持许可证制度，并且在这些项目中，平均供资范围是 10,000 美元到 50,000 美元。涉及当地专家（危地马拉、秘鲁）时费用较低，而需要顾问时（如老挝人民民主共和国）则费用较高。

10. 在 34 个有关许可证制度的已批准项目中，拉丁美洲和加勒比地区拥有 14 个（41%），其次是亚洲和太平洋及非洲，各有 7 个项目（21%）。环境规划署作为执行机构扮演主要角色，拥有 34 个项目中的 17 个（56%）。下列清单综述了 16 个已完成项目的执行延迟情况（详情见附件五，表 10 a/b）：

- 4 个按时完成；
- 4 个延迟了 1 至 6 个月；
- 2 个延迟了 6 至 12 个月；
- 5 个延迟了 13 至 24 个月；及
- 1 个延迟了两年多。

11. 由加拿大环境部执行的四个已完成项目中，有三个已延迟 1 至 12 个月，另一个则延迟了 13 至 24 个月。就环境规划署而言，8 个项目中有 3 个按时完成，还有 3 个延迟了 13 至 25 个月或更久。（见附件五，表 11 a/b）。

12. 环境规划署的履约协助方案小组监测了第 5 条国家执行许可证制度的情况。尽管在大多数情况下无法获得这类制度的模式与功能详情，但环境规划署的统计数字提供了最全面的综述，如下表 2 所示：

表 2: 第 5 条国家许可证制度现状*			
地区	完全执行	编制阶段	提交政府批准
西亚	7	2	1
南亚/东南亚和太平洋/太平洋岛屿国家	18	8	1
拉丁美洲与加勒比	20	7	3
非洲	27	12	8
欧洲与中亚	10	2	
<b>共计</b>	<b>82</b>	<b>13</b>	<b>31</b>

\* 资料来源：环境规划署/技经司。

## b) 评价问题

13. 除及时完成淘汰项目以减少消耗臭氧层物质的需求外，管制国际贸易和减少非法贸易最卓有成效的方法在于严格执行进口许可证制度。努力确保每个缔约方批准《蒙特利尔修正案》和引入许可证制度，连同进行适当的海关培训，业已规定为优先进行的事项。然而，大多数制定了许可证制度的第 5 条国家执行该制度和进行海关培训的时间并不很长，在运作和效能方面的经验相对较少。此外，管制进口许可证的法律行为可能显示出各个国家不同的特征和规定。在某些情况下，许可证制度的颁发仅为了更好地监督贸易过程，而在另一些情况下，许可证制度是作为计划减少消耗臭氧层物质消费的工具而运作的。因此，在每种情况下，分析基于许可证制度的法律行为的实际内容非常重要。在许多第 5 条国家，仅根据许可证制度来控制消耗臭氧层物质的进口，而允许再出口却促进了非法贸易。此外，在许多国家，含消耗臭氧层物质的混合物未得到控制。

14. 由于尚无一个国家执行许可证制度要求，也就不存在非法进口问题（除非完全禁止进口所讨论的物质，通常这与主要的消耗臭氧层物质第 5 条国家无关）。问题在于许可证制度在从颁发许可证到海关检查的整个过程中是否得到有效执行。

15. 这要求获得关于以下情况的定量和定性信息：关于禁止消耗臭氧层物质和含消耗臭氧层物质设备的特别条例；进口商的注册过程；给他们分配配额的制度；颁发许可证的条件；许可证文件；违反法律法规给予的制裁与罚款；与监测和报告消耗臭氧层物质贸易有关的要求；发生非法进口情况所应用的处理程序；最后但并非最不重要的是，业务公司和其他有关利益方参与各项法规的解释和适用。有趣的是，环境规划署/亚太区域办事处目前正在考虑对许可证制度的有效性进行比较分析。一旦完成，其结果将纳入这次评价工作。

16. 关于进口许可证制度功能的更多问题与下列情况有关：

- (a) 关于分配配额的文件如何使用于管理过程中（这些文件可望抄送给海关当局吗？其格式留下空白标注进口数量并将这些数量从整个分配配额中扣除吗？等等）
- (b) 负责臭氧问题的机构与海关当局之间在各种层次上的联系与合作（存在与编制格

式和管理程序有关的任何合作吗？国家臭氧机构定期参加新海关官员培训吗？已颁发的许可证清单分发到海关了吗？海关部门在国家臭氧委员会有代表吗？）

- (c) 相邻国家的国家臭氧机构之间的合作及其性质，特别是通过区域网合作（如交换关于持有进口许可证的进口商的信息、控制进口商在出口许可证核准前持有进口许可证、培训材料的合作、交换关于已确定或怀疑的非法贸易，使用过的方法和区域需求与供应前景规划的信息，等等）。网络的相关活动由环境规划署在其向执行委员会第四十三次会议提交的中期报告（第 43/58 号文件，附件一）中描述和评价。

17. 一些国家已采用特殊的执行措施来减少消耗臭氧层物质的消费。他们向消耗臭氧层物质征收进口或环境税，或资助替代物质以便努力平衡受控物质与臭氧保护物质的价格。经济奖励，如税金或进口税以提高消耗臭氧层物质的相关价格（或减少非消耗臭氧层物质替代物的价格），是一件双刃工具，因为扩大价格差距可能构成对非法贸易的奖励。因此，人为改变市场价格关系只有在严格和高效的进口管制伴随的情况下才可能造成消耗臭氧层物质的减少。成功打击非法贸易取决于执行机构的能力，如海关、警察和环境机构，这与政治意愿和相关国家政治与经济发展水平密切相关，所引入和应用的执行措施的分析与评估是评价工作将研究的重要问题。

18. 与私营部门紧密合作编制和执行许可证制度似乎十分重要。因此，评价工作应适时考虑负责臭氧问题的国家机构一方与受到影响的私营公司一方之间现行的联系与合作计划。对进口商、产业和制冷行业专业人员协会如何或以何种形式参与编制和执行条例，且准备在何种程度上进行合作的问题（如通过定期报告、参加培训活动、购买回收与再循环设备，等等）应予以调查研究。

### 三、海关培训项目

#### a) 综述

19. 迄今为止，已有 159 个海关培训、许可证制度和有关项目已得到批准。127 个为培训和许可证制度项目，其中 51 个已完成，41 个项目完成报告已收到。此外，32 个进行中的国家淘汰计划中有 7 个年度阶段已完成，其中也包括海关培训和许可证制度活动。

表 1: 海关培训/许可证制度和有关项目

类别	已批准项目数	已完成项目数	已收到的项目 完成报告
海关培训独立项目	6	2	2
作为制冷剂管理计划部分的各海关培训项目	58	24	24
纳入制冷剂管理计划项目的海关培训与许可证制度培训	23	5	5
区域海关培训项目	6	4	3
许可证制度独立项目	4	2	1

区域许可证制度项目	8	7	1
作为制冷剂管理计划项目部分的各许可证制度	22	7	5
国家淘汰计划中海关培训、许可证制度和消耗臭氧层物质监测	32	7	0
<b>共计</b>	<b>159</b>	<b>58</b>	<b>41</b>

20. 大多数海关培训项目由环境规划署执行（51 个），其次为工发组织（13 个）、加拿大（11 个）和澳大利亚（8 个）。剩余项目几乎在芬兰、法国和德国之间平分，而到目前为止，波兰和开发计划署仅执行了几个项目。一些许可证和培训活动作为世界银行执行的国家淘汰计划的一部分得以进行。多数海关培训项目位于非洲（33 个）、依次为亚洲和太平洋（29 个）及拉丁美洲和加勒比地区（22 个）（见附件五表 2 和表 3）。

21. 由环境规划署执行的海关官员国家培训方案除环境规划署编制的《海关官员培训手册》外，还使用《消耗臭氧层物质法规和进口/出口许可证制度国家手册》。国家手册是在培训开始前编制的，是国家特定条例的简编，提供了有关消耗臭氧层物质问题的背景信息，包括管理计划综述、其修正案及国家淘汰战略，因而被用作主要教学材料。国家手册还提供关于国家法规和许可证制度、业经修订的海关法、消耗臭氧层物质监测和控制系统与含消耗臭氧层物质产品及所涉海关官员问题的全面深入的信息。

22. 培训工作分两个阶段进行。在第一阶段，为海关培训员和其他有关利益方开办讲习班，以“培训培训员”。在第二阶段，受训的海关培训员可望适当培训其他来自主要进入港办事处的海关官员和环境稽查员，并编制将纳入海关学校课程的培训模块。这些讲习班的参与者还将得到关于如何使用消耗臭氧层物质识别器的培训。

23. 其他机构如德国技术合作署和加拿大环境部采用了系统方法，只作了部分修改。他们也使用环境规划署的培训手册。工发组织在罗马尼亚的研讨会时间更短，并且后续措施大多依靠国家臭氧机构进行；其他国家的活动尚未得到分析。由世界银行和其他机构执行的国家淘汰计划中的海关培训活动最近才进行，需要进一步进行调查研究。

## b) 执行延迟

24. 基于原完成日期的项目的 32%和基于修订后完成日期的项目的 23%延迟了两年之久，并且分别只有 3%和 1%及时完成（见附件五，表 5a 和 b）。原因之一是，海关培训项目第一期在国家进口许可证制度出台前尚未启动，并且相关法律行为的编制通常是一个相当长的过程。造成延迟的另一个原因是第一期（培训培训员）和第二期（培训海关官员）的后续工作存在困难。

25. 从原定完成日期看，由加拿大环境部执行的 7 个项目中有 6 个（86%）延迟了 13 至 25 个月或更久；从修订后的完成日期看，7 个项目中有 5 个（71%）延迟。在环境规划署方面，从原定完成日期看，18 个项目中有 14 个（77%）延迟了 13 至 25 个月或更久；从修订后的完成日期看，18 个项目中有 11 个（61%）延迟。（见附件五，表 6a 和 b）。如

果有信息提供，关于延迟的最常用的解释与延迟执行许可证制度有关。

### c) 评价问题

26. 至关重要的是，培训战略应纳入现行机构、国家和/或次级区域框架，以确保培训工作在多边基金捐款最终确定后能够继续下去。虽然在大多情况下，可获得根据多边基金项目供资的讲习班受训的人员总数，就后续措施和进行中的培训来说，事实并非如此。相应的问题是：培训培训师方法实际上符合其宗旨吗？即在项目第二期及项目完成后培训其他海关官员？从可获得的信息来看，事情并非一直如此，而且似乎只有少数国家做到将培训模块纳入海关培训机构的课程（见附件一 b）。

27. 根据从文件分析和为本案头研究报告和 10 个低消费量国家早些时的制冷剂管理计划评价而进行的实地访问期间，收集的信息，以及从环境规划署工作人员和培训师的讨论中收集的信息，编制和执行海关培训项目由于下列因素似乎存在一些困难：

- (a) 在许多国家，与消耗臭氧层物质有关的管制措施并未列入海关的优先事项，海关的优先事项通常集中于税收、缴获更具直接危险性的产品，如武器、毒品、受禁食品和种子等；
- (b) 如上所述，编制和批准许可证制度作为进行海关培训的先决条件，在一些情况下往往比预想的要花费更多时间，原因是缺乏起草这种制度的国家专门知识，也因为与有关部委的政治协调程序过长，环境部除外。相关部委指的是财政部、商业部和工业部以及所涉及的商业利益集团；
- (c) 管制化学物质特别是混合物进口因变更贸易名称、包装和化学配方而变得日趋复杂；
- (d) 海关官员通常缺乏化学方面的专业知识，并且不经常使用所提供的识别器，其原因需要进一步探究；
- (e) 海关当局，特别是在一些小国，有时不愿意派遣很多海关官员参加培训课程，特别是培训时间超过一天的情况下；
- (f) 为期 2-3 天的讲习班往往不能向培训师输送足够的信息和信心去自己组织和开办培训讲习班；
- (g) 海关人事调动率高，有时导致受培训开办讲习班的培训师不如所预期的那样可以找到；
- (h) 通过将臭氧有关的问题纳入国家海关学校的常规课程和课堂的持续后续措施很少得到报告，其原因需要进一步加以分析。

28. 考虑到这些问题，评价工作必须不但要分析已完成项目的有效性和完成正在进行的



海关培训项目的最佳方法，而且要考虑可能的替代与补充活动，如：

- (a) 修改后的五天混用方法（环境规划署），将为期三天培训培训员与一天培训员实践准备（准备另一个为期一天的海关官员讲习班）结合起来。这使培训员能够获得将在同一星期并且在国际培训员面前应用的专门技能，国际培训员必要时还能提供更多建议。该方法首先于 2002 年在萨摩亚成功执行，目前又在加勒比进行测试（见附件六）；
- (b) 提高所有海关官员在消耗臭氧层物质方面的认识并且同时培养海关方面的专业小组来处理环境问题（如《关于消耗臭氧层物质的公约》、《濒临绝种野生动植物国际贸易公约》和其他公约），以及应请求支援各主要入关点的海关官员；
- (c) 加强当地/地方环境机构，积极支持海关产生疑问时的管制程序。此外，可能需要进一步发展与其他执行机构的合作；
- (d) 依靠私营部门的技术人员、大学教职员或政府实验室来协助海关识别可疑装运物品；
- (e) 将应用各种多边环境协议（《巴塞尔公约》、《斯德哥尔摩公约》、《鹿特丹公约》）的培训纳入一个培训研讨会（绿色海关倡议）。

29. 评价工作的起点是培养对许可证制度的实际功能和海关管制做法的洞察力，以及了解控制消耗臭氧层物质进口的海关程序。海关官员每天处理大量货物，必须对交给他们的每份票据迅速做出决定。正如海关控制专家所述：“非法进口的主要部分是从前门进来的。”非法进口商所使用的工具多种多样，从进口商希望将被海关官员忽略的合法声明（如关于混合物）的灰色地带、不透明的信息如商标或关于目的地或数量的虚假实例信息（如转运），到更多贴错标签或隐藏货物的典型欺诈行为。

30. 票据管制是更详细控制的途径，并且对以下问题的回答将很有帮助：

- (a) 那些信息将促使海关官员申请许可证？
- (b) 使用产品海关代码时，关于消耗臭氧层物质的这些代码是最新的吗？谁将产品海关代码插入声明—海关官员、进口商还是经纪人？以何种信息为依据？
- (c) 使用何种其他信息促使申请许可证？

31. 海关官员对非透明信息（如商标）如何做出反应？

- (a) 第一线官员拥有在消耗臭氧层物质方面富有经验的官员的后备支持吗？
- (b) 以私车或小型货车装运的少量进口物品（如服务企业进口的瓶装制冷剂）如何在边境检查点得到处理？

32. 更多的问题是：例如，管制是在边境点还是在国内特定海关进行？在发生可能含消耗臭氧层物质的可疑装运货物的情况下，海关官员如何着手处理？海关经纪人和环境稽查员（如果有的话）在装运货物管制过程中起何种作用？应用何种采样方法？在什么情况下海关要通知国家臭氧机构或其他机构，如地方环境机构或进口商本身？何时、或具备哪种特征时容器或圆桶会看起来很可疑？在什么情况下海关认为必须进行化学分析？还必须了解的是，识别器是否已由多边基金供应，并且识别器在何种程度证明对于识别进口物质是充分和有用的？自从法规和许可证制度出台以来，海关实际上检查了非法进口品吗？如果是，非法贸易采用了哪种形式和途径？从有关所有这些问题的可靠信息中可能得出的结论是，海关打击非法贸易是否实际上有助于防止非法贸易，并且最终减少消耗臭氧层物质的消费量。

#### 四、可用于和已用于案头研究的报告的数量与质量

33. 对于单个海关培训项目而言，100%的项目完成报告按期收悉，这些报告是制冷剂管理计划的一部分但有独立的项目编号。纳入制冷剂管理计划的海关培训项目和独立项目情况相同。50%的已完成独立许可证制度项目的项目完成报告已收悉，已收到的还有分别占 71% 和 75%的许可证项目作为制冷剂管理计划的一部分和区域海关培训项目。国家淘汰计划规定活动的项目完成报告尚未收到，这些计划仍在进行中，并且提供关于已完成的年度阶段情况报告。对于已完成的区域许可证制度项目而言，只有 14%的项目完成报告按期收悉。

34. 对已收到的 34 个关于海关培训的项目完成报告的分析情况列示如下（见附件一 b）：

- (a) 88%的报告提供第一期学员的实际总数；
- (b) 67%的报告提供第二期学员的实际总数；
- (c) 仅有 3%的报告提供继续开办海关官员培训研讨会（第二期完成后）的查询信息；
- (d) 40%的报告提供培训作为模块纳入培训学校课程的查询信息；
- (e) 12%的报告提供关于计算机控制的海关数据库系统是否建成的信息；
- (f) 关于法规框架，仅提供极少的关于框架出台与否的信息，无框架模式与功能详情；
- (g) 对于技术设备而言，73%的报告提供关于所供应的识别器数量的信息，但未提供识别是否用于海关管制的信息。

35. 从项目完成到提交项目完成报告平均有 12 个月的间隔。最长是 36 个月，最短是 6 个月。按机构平均花费时间来看，瑞典尽管仅以一个项目为基准，花费时间最长（20 个月），以下依次为加拿大（18 个月）、芬兰（11 个月）、环境规划署（11 个月）和工发组织（8 个月）。

36. 虽然项目完成报告延迟的大多数原因已做过简明解释，但仍有一些原因根本未提及，甚至有重大延迟项目被描述为“令人满意并且按照原计划完成”。这似乎是最近收到的由环境规划署编制的项目完成报告一个特征。

37. 环境规划署目前正在与制冷剂管理计划/履约协助方案官员、国家合作伙伴和区域培训机构共同努力，评价包括培训手册在内的自身的文件，旨在确定着手开办未来讲习班的最

佳方法。例如，已考虑制作海关培训手册光盘，并且目前正在为中国进行在线培训。一旦这项工作完成并实施，环境规划署可能将其推广到其他国家。

38. 虽然讲习班报告包括评价部分，但这仅提供学员对所接收信息的质量和数量的满意度的有限了解。讲习班结束时给出的答案往往在“优秀”到“良好”这两个类别，并且对所使用材料的实际质量和所学课程应用于日常实践的信息提供极少，这只能在日后才能得到评价。

39. 就手头的文件而言，没有充分可靠的信息来准确确定执行效能和培训项目的结果与影响。

40. 如附件一 a 中的许可证制度项目综述所示，很少提供关于已确立的许可证制度模式的信息，更为重要的是，无法找到关于该制度的实际执行情况和有效性的信息。

41. 虽然在一些结束性淘汰管理计划草案或制冷剂管理计划修订资料的请求中出现过有关许可证制度的说明，但这些制度所产生的实际结果往往未提供，而且说明大多很简洁。这可能归因于以下事实：这些结果是最新的，或对这些结果的报告未被视为强制性的。

42. 为了合理地评价许可证制度的有效性，需要提供关于其管理程序、运作模式和直接效果（即缴获、罚款、缴获货物的处理等）的真实信息。从这些信息中，可以得出关于其是否有助于限制非法贸易和减少消耗臭氧层物质消费的结论。

## 五、评价方法

43. 对许可证制度的有效性和海关培训项目的评价首先要求提供已出台的法律和行政体系的信息，如果海关培训项目先于国家特定条例手册的编制，每次实地访问前必须仔细阅读这些手册。

44. 其次，关于海关培训的可用文件（讲习班报告、项目完成报告）需要加以分析并补充访问培训师和学员的结果。第三，国家臭氧机构、高级海关官员、财政、贸易和工业部代表及进口商的观点和经验需要收集起来加以讨论。还应该包括与海关官员和环境稽查员（他们实际上对装运货物进行实际控制）及那些官员（如海关经纪人）的会谈记录，在许多国家，他们实际上核查海关单证。需要进行这种会谈来评估海关培训的有效性并对培训项目的未来方法得出准确的结论。

45. 关键问题在于所有这些引入和应用的措施和文件（培训、许可证制度、海关代码、法规与实施）是否有效地证明足够并且充分，可以增进对贸易程序的管制，并且相应地查明、打击和防止非法贸易的交易活动。为了核查这一点，需要确定制度分析方法来评价实际有效性。

46. 评价所采用的法律、技术和培训措施的实际影响将是一项非常复杂的工作，原因是海关培训、进口许可证或技术识别器设备一方，与减少消耗臭氧层物质的消费量和防止非法

交易一方之间没有直接的因果联系。应该牢记的是，如果没有检查到非法装运货物，其原因可能是海关工作效率低或根本不存在非法贸易。非法贸易的实际数量从来就无法精确地确定。因此，必须特别关注许可证制度的整体组织结构和功能，以及海关、其应用的采样方法、质量认证和报告等的具体执行情况。

47. 将要分析的系统可暂时作如下说明：

### 主要评价问题

	行动领域	待分析的问题
1.	背景信息	<ul style="list-style-type: none"> <li>(a) 次级行业分摊消耗臭氧层物质的消费量、近期趋势和前景</li> <li>(b) 注册进口商、维修车间、技术人员总数</li> <li>(c) 已供资和执行的项目</li> <li>(d) 国家淘汰战略和履约状况</li> </ul>
2.	法规和进口许可证制度	<ul style="list-style-type: none"> <li>(a) 批准《蒙特利尔修正案》</li> <li>(b) 进口许可证制度（如果已出台）的主要特征，包括是否包含所有消耗臭氧层物质</li> <li>(c) 关于禁止消耗臭氧层物质和含消耗臭氧层物质的设备的特别条例</li> <li>(d) 分配给注册进口商的配额制度</li> <li>(e) 颁发许可证的条件</li> <li>(f) 管理程序和文件</li> <li>(g) 负责臭氧问题的当局与各级海关官员之间的合作</li> <li>(h) 监测和报告消耗臭氧层物质贸易的系统</li> <li>(i) 违反法律法规所给予的制裁或罚款</li> <li>(g) 经营与实施机制和能力</li> <li>(k) 使私营部门参与解释与执行规则和条例</li> <li>(l) 履约协助方案小组为编制许可证制度而获得的支持</li> </ul>
3.	海关程序	<ul style="list-style-type: none"> <li>(a) 在边境点或国内进行的管制行为</li> <li>(b) 除用来识别物质和混合物的海关产品代码外，引入国家海关代码体系</li> <li>(c) 消耗臭氧层物质进口商将向海关呈递的单证（许可证、商标、代码号、标签等）</li> <li>(d) 发生可疑装运货物的情况下所应用的程序</li> <li>(e) 所使用的采样或其他识别方法</li> <li>(f) 可疑装运货物的特征</li> <li>(g) 发现可疑装运货物的情况下将处理的事件</li> <li>(h) 进口许可证制度出台以来所检查到的非法进口物</li> <li>(i) 安装电子监测系统 and 海关的有效使用情况</li> </ul>
4.	海关培训	<ul style="list-style-type: none"> <li>(a) 所进行的海关培训课程和受训官员总数（根据独立的项目、制冷剂管理计划、区域或行业淘汰项目）</li> <li>(b) 国内海关培训能力建设</li> <li>(c) 培训活动的延续性（后续措施、复习）</li> <li>(d) 海关培训所使用的课程与材料</li> <li>(e) 所供应的识别设备</li> </ul>

	行动领域	待分析的问题
		(f) 海关可用识别器的充足与充分性 (g) 识别器的有效使用 (h) 海关替代机制的确立 (i) 海关对臭氧问题采取的优先行动
5.	附加强制措施以减少消耗臭氧层物质的消费量	(a) 建立负责检验公司与终端用户的地方（或区域）环境机构 (b) 影响相应价格的措施（进口税、征收消耗臭氧层物质环境税、或替代方案补助） (c) 促进技术转换的其他财务或财政刺激的应用
6.	与国家有关利益方的合作和区域性合作	(a) 涉及公司和专业人员协会（如果已建立）的战略与消耗臭氧层物质淘汰过程的运作程序 (b) 进口商（和维修行业）的定期报告与核查系统以评估数据的可靠性 (c) 在区域网络与邻国交流和合作的有效性 (d) 网络成员之间的共同努力和经验交流，以便打击消耗臭氧层物质的非法贸易，包括次级区域合作

48. 所收集到的关于上述问题的信息应得到进一步解释，以便就国家或地区的运作有效性比较和所引入的措施得出结论。其依据是以海关和其他有关利益方就制度的合理功效所做报告中的经验分析，或可利用时，海关和其他有关利益方在成功、缺陷、瓶颈、实践中发现的问题方面进行的自我评价。这种分析的结果可能以矩阵的形式呈递，同时比较关于措施、迄今为止的经验、按所访问国家分类的优势和弱势。

## 六、工作计划评价

49. 考虑到这种方法的全面特征，应关注实地访问的期限。对统计数字、监测、海关代码、主要的许可证制度运作、业务公司的态度等的调查无法通过对每个有关利益方进行 30 分钟的采访来进行。需要收集和审查文件（有些只能在现场获得），以获取对所调查国家的特殊条件和问题的全面了解。应挑选大约 10 个国家进行实地访问，旨在提供具有代表性的情况；访问期限可能需要 4 至 5 日（依国家大小而定），应考虑是否有必要与主要入关点的海关官员直接访谈。

50. 已精心制作（附件三）一份项目清单，该清单将根据各国的特殊情况和额外要求修改、补充或删除。所有条目将通过包括以下的不同资料来源加以陈述：

- (a) 国家臭氧机构；
- (b) 涉及臭氧/环境问题的政府部门；
- (c) 海关部门；
- (d) 精选的海关管制点；
- (e) 消耗臭氧层物质进口商；
- (f) 制冷技术人员协会（如果已建立）。

51. 评价团的旅行计划将由多边基金秘书处与将访问国家的臭氧机构和有关执行机构和双边机构协商制定。履约协助方案小组也可以提出提案。国家的最后选定应取决于这些协

商的结果。选择应采用以下标准以提供对比信息：

- (a) 履约国家和其他未履约国家；
- (b) 确立了进口许可证制度的国家和其他未确立进口许可证制度的国家；
- (c) 已报告消耗臭氧层物质非法贸易事件的国家和其他尚未报告的国家；
- (d) 拥有不同海关培训方案的国家（独立方案、区域性方案或作为制冷剂管理计划或淘汰计划一部分）；
- (e) 大小与所处地区不同的国家；
- (f) 由不同执行机构和双边机构执行的项目。

## 附件

- 附件一 项目完成报告中的信息
  - 一 a 许可证项目
  - 二 b 海关培训项目
- 附件二 已审议的文件
- 附件三 实地访问问题清单
- 附件四 罗马尼亚和塞内加尔实地访问期间调查结果摘要
- 附件五 已批准和完成项目统计数字综述
- 附件六 环境规划署结合第一期和第二期海关培训的新方法

## Annex Ia: Information in PCRs on Licensing Projects

UNEP/OzI.Pro/ExCom/44/12

Annex Ia

Country	Project Number	Title of project	Implementing Agency	Funds Approved	Legislation/Regulations	Workshop related information	Equipment	Computerized System in place (database)	National coordinating agency/ Implementing agency	Implementation delays	Months from completion to PCR submission
Burkina Faso	BKF/SEV/1/TRA/04	Workshop on monitoring and control of ODS consumption	UNEP	14,500	Enacted	13 representatives from government, 9 representatives from customs and 2 from industry + 8 representatives from neighbouring countries, October 1994				No	62
Gambia	GAM/REF/29/AS/08	Policy development and related information dissemination	UNEP	22,000	Implemented.	One day wsop to define a policy framework to help Gambia establish a mecanism to control export/import			Gambia National Environment Agency/UNEP	Yes, 22 months, no explanation provided	5
Georgia	GEO/SEV/27/TAS/06	Promoting compliance with trade and licensing provisions of the MP in CEIT	Canada	33,900	Implemented	38 participants from 10 countries in the region participated in the Regional workshop			Ministry of Environment and Natural Ressources, protection of Georgia/UNEP on behalf of Canada	Yes, 7 months, country took longer than planned to develop legislation	12
Guatemala	GUA/REF/27/TAS/20	Implementation of RMP: Licensing system	UNEP	10,000	Implemented			Data collected/Annual ODS report	Ministry of Environment and Natural Ressources, National Ozone Unit/UNEP	Yes, 22 months. Delay to establish the importers register. Reluctance from importers to comply with the licensing process and from customs officers to legitimize the process	9
Mali	MLI/REF/29/TAS/06	RMP: Assistance in drafting ODS related legislation	UNEP	10,980	Implemented			Quota system is working well		Yes, 13 months. Several internal reasons in the country	13
Peru	PER/REF/27/TAS/25	Implementation of RMP; Support for a licensing system	UNEP	10,000	Implemented, 2001	reference to this being completed included in PCR			Ministerio de Industria, Turismo, Integracion y Negociaciones Comerciales Internacionales, Oficina Tecnica de Ozono/UNEP	Yes, 16 months. Establishment of licensing system required relevant coordination with importers and customs officers	17
Uruguay	URU/REF/27/TAS/31	Implementation of a licensing/quota system	Canada	11,300	Implemented		Yes		Ministerio de vivienda, ordenamiento territorial y medio ambiente/UNEP on behalf of Canada	Yes, 8 months, due to the institutional nature of the project	11

Annex Ib: Information in PCRs on Customs Training Projects

Country	Project Number	Title of project	Implementing Agency	Funds Approved	Legislation/Regulations	Country handbook status	Phase I	Phase II	Equipment	Ongoing training?	Module included in curricula?	Computerized System in place (database)	National coordinating agency/implementing agency	Implementation Delays	Comments	Months from completion to PCR submission
El Salvador	ELS/REF/25/TRA/08	RMP Implementation: customs training	UNEP	38,000	Yes		30 Customs officers trained, September 2001	109 Customs officers trained	8 identifiers purchased					Yes, 55 months, legislation in place 22 months after project approval. Slow progress after phase I due to lack of identifiers	Project is described as "satisfactory and as planned"?	7
Samoa	SAM/REF/32/TRA/03	Implementation of the RMP: Training of customs officials and NOU staff	UNEP	53,500	Implemented	Prepared by the ozone officer	10 customs officers + 7 stakeholders trained and certified September 2002	9 customs officers + 8 stakeholders trained and certified, September 2002. An additional 11 customs officers were trained in September 2003	Yes				Planning and Urban Management Agency, Ministry of Natural Resources and Environment/UNEP DTIE	Yes, delays in establishing licensing framework, change of ozone officer, unavailability of consultant to draft handbook	mixed 5 day approach tried for the first time, successfully	2
South East Asia and the Pacific	ASP/ASP/SEV/29/TR A/31	Regional workshop on control and monitoring of ODS	Sweden	55,000										2 months	Three network countries were able to design a licensing system after receiving inputs from the workshop and after sustained follow up by RNC	14
Sudan	SUD/REF/28/TRA/11	RMP: training of customs officers and development of criteria for ODS and ODS consuming equipment	UNIDO	38,250	Implemented		26 officers in customs department and customs offices trained, 10 were planned					Database was established before the training	Ministry of Industry, NOU/UNIDO	Yes, underestimation of time required for preparation of training		14
Uruguay	URU/REF/27/TRA/29	Customs officers training programme	Canada/UNEP	71,190			27 customs officers trained, November 2001	94 customs officers trained, June 2003	Yes		Yes, included within regular customs training programmes		Ministerio de vivienda, ordenamiento territorial y medio ambiente/UNEP on behalf of Canada	Yes, 38 months, project execution delayed until legislation was passed		6



Annex Ib: Information in PCRs on Customs Training Projects

Country	Project Number	Title of project	Implementing Agency	Funds Approved	Legislation/Regulations	Country handbook status	Phase I	Phase II	Equipment	Ongoing training?	Module included in curricula?	Computerized System in place (database)	National coordinating agency/implementing agency	Implementation Delays	Comments	Months from completion to PCR submission
Antigua	ANT/REF/26/TRA/04	Training of customs	Canada/UNEP	44,000	In place	finalized	One 3 day wsop, 12 Customs officers and 10 key stakeholders trained July 2001 (planned=22)	5 wsops, 81 Customs officers including 1 coast guard and 1 police department (planned=100)	provided as part of UNEP project "Global enabling activity"		yes, in customs and excise training curricula of training school, and also in refresher courses for experienced customs officers	ASYCUDA computerized system in place. Duty free concessions to imports containing non ODS substances and 500% tax to CFC's	Ministry of Commerce, Industry and Business Development/UNEP on behalf of Canada	Yes, 23 months due to implementation of legislation and resource/personnel and coordination problems	NOU reports licensing system needs to be improved?	12
Bahrain	BAH/REF/26/TRA/06	RMP: Customs training	NOU/UNEP	30,000	Yes, in place in 1999	Completed	3 day wsop January 2001, 30 participants trained	Training of 12 customs officers. Additional training of over 200 customs officers trained in Phase II, end of 2001	3 refrigerant identification kits				Environmental Affairs, Ministry of States, Municipalities Affairs & Environmental Affairs/UNEP	24 months, the regulatory framework was not in place until 1999		10
Belize	BZE/REF/29/TAS/03	RMP Implementation: monitoring and control of ODS and training program for customs and other officers	UNEP	28,000	Implemented		18 participants March 2002,	over 75 key persons trained July 2003					Ministry of natural resources and environment/Canada with assistance from UNEP	Yes, 30 months due to length in establishing policy legislation component. Project described as "satisfactory and as planned"	two imports stopped pending Belize's NOU approval	8
Burkina Faso	BKF/REF/29/TRA/09	Training of Customs Officials	Canada/UNEP	48,025	Enacted		20 Customs trainers, senior customs officials and relevant stakeholders, August 2001	120 Customs officials trained	Yes, 5 refrigerant identifiers		Yes		Ministere de l'Environnement et de l'Eau/UNEP on behalf of Canada	14 months, NOU busy with implementation of RMP + difficulty of coordinating training of 120 Customs officers		14
Burundi	BDI/REF/26/TRA/03	Training of customs officers	UNEP	30,000	Implemented 03/2000		20 customs officers trained, 14-16 November 2001. (25 mentioned in remarks of MFS)	29 customs officers trained, 17-19 April 2002	yes				National Ozone Unit/UNEP	26 months, establishment of MOU, pb w/translation. Also pb w/signed expenditure report	Control and monitoring of CFCs is intensified*	14
Chad	CHD/REF/29/TRA/06	Training programme for customs officers	UNEP	75,000	Implemented	available	29 custom trainers, senior customs officials and relevant stakeholders trained. Two day wsop, November 2001	322 customs officials trained	17 refrigerant identifiers		Yes, included in customs and excise training curricula of training school		Ministere de l'Environnement et de l'Eau/UNEP	Yes, due to set up of legislation		6
Comoros	COI/REF/35/TRA/08	Training of customs officers in identification and control of ODS	UNEP	39,000			25 customs officers trained, September 2003	30 customs officers trained	Yes				Bureau national ozone/UNEP	Yes 17 months, no explanation?	Project is described as "satisfactory and as planned"	
Congo	PRC/REF/32/TRA/09	Customs training programme	UNEP	69,400			25 customs officers trained, May 2002	170 customs officers trained, June, October 2003	Yes		Yes, included in customs and excise training curricula of training school		Bureau national ozone/UNEP	No		8
Croatia	CRO/REF/28/TRA/12	RMP: Customs training	UNIDO	32,250	Implemented 1999 by-law	Croatian handbook was made	34 officers trained 923 from 12 customs points, 10 from customs district, 1 from department of prevention of illegal trade, 40 were planned		12 identifiers, (10 road, 1 ship). 30 were planned				Ministry of Finance, Customs Directorate/UNIDO	12 months, intra Ministerial negotiations took "a long time" to complete. Also un-readiness of Customs directorate for training on ODS issues		4

Annex Ib: Information in PCRs on Customs Training Projects

UNEP/OzL.Pro/ExCom/44/12  
Annex Ib

Country	Project Number	Title of project	Implementing Agency	Funds Approved	Legislation/Regulations	Country handbook status	Phase I	Phase II	Equipment	Ongoing training?	Module included in curricula?	Computerized System in place (database)	National coordinating agency/implementing agency	Implementation Delays	Comments	Months from completion to PCR submission
Dominican Republic	DOM/REF/25/TR/14	Customs Training	UNEP	53,000	Implemented, 12 August 1999. Official agreement signed between General Customs Office and Environment and natural Resources Secretariat	Yes, disseminated during follow up training wspot and being used as reference document	36 participants, 30 of them experts	96 Customs officers trained	Yes, as planned		Yes, MP related training module included	Yes, created upon 2nd customs training course. Now in use allowing the reporting on imported ODS final year reports.	Ministry of Agriculture, Governmental Ozone Committee/UNDP, UNEP	Yes, in finalization of phase II due to country local situation. Coordination with local customs office was no good. NOU undertook active efforts to develop effective links.	Further training of environmental police officers should be planned, follow up on support measures for enforcement of licensing system should also be planned. Database system should be improved. Follow up training required due to large number of entry points in the country.	8
Gabon	GAB/REF/26/TRA/05	Customs training	UNEP	31,000			27 customs officers trained, August 2002	60 Customs officers trained, June 2003			Yes, included in customs and excise training curricula of training school		Bureau national ozone/UNEP	Yes, 43 months. Only reference is that phase 1 training was pending on establishment of legislation	Project described as "satisfactory and as planned"?	8
The Gambia	GAM/SEV/19/TRA/03	Training programme for customs officers	UNEP	12,598	Implemented	Prepared	66 customs officers trained, two day wspot March 2001	40 customs officers trained, February 2002	5 refrigerant identifiers		Yes, inclusion of training programme into the customs training curriculum		Gambia National Environment Agency/UNEP	Yes, 22 months, no explanation provided		5
Guinea	GUI/REF/30/TRA/06	Training for customs officers	UNEP	42,500			27 Customs officers trained, December 2002	56 customs officers trained	yes				Bureau national ozone/UNEP	No		18
Ghana	GHA/REF/32/TRA/13	Customs training programme	UNEP	81,000			30 officers trained, June 2002	150 Customs officers trained, October to December 2002			Yes, included in customs and excise training curricula of training school		Ministry of finance and economic planning, Environmental protection agency/UNEP			21
Global	GLO/SEV/27/TRA/184 and 180	Customs Training Manual	UNEP in cooperation with Canada and Finland	60,000									Environment Canada and the Ministry of Foreign Affairs of Finland in cooperation with UNEP DTIE	Complexity of the subject and need to consult with many stakeholders resulted in longer project duration		11
Global	GLO/SEV/32/TRA/218	Global enabling activity for customs training	UNEP	164,400					identifiers were provided to 19 countries					Yes, 19 months, due to time required to identify consultant firms		1
Guatemala	GUA/REF/27/TAS/18	Customs officers training programme	UNEP	34,000	Implemented		36 participants trained (October 2001)	122 customs officers trained (July 2002)	16 refrigerant identifiers purchased					25 months, customs agreement delayed for over a year, and two years to complete imports register		6
Honduras	HON/REF/28/TRA/05	RMP Implementation: customs training	UNIDO				378 officers trained	?	Yes 26 Refrigerant identifiers delivered				Unidad tecnica de ozono/UNIDO	Yes, 29 months. Long time for the contractor to understand the program for their signature on the UNIDO contract		9

Annex Ib: Information in PCRs on Customs Training Projects

Country	Project Number	Title of project	Implementing Agency	Funds Approved	Legislation/Regulations	Country handbook status	Phase I	Phase II	Equipment	Ongoing training?	Module included in curricula?	Computerized System in place (database)	National coordinating agency/implementing agency	Implementation Delays	Comments	Months from completion to PCR submission
India	IND/SEV/30/TAS/253	Develop policy and customs training strategies	UNEP	50,000			yes	?					Ozone Cell, Ministry of Environment and forests/UNEP	Yes, due to resource constraints and difficulties in coordinating project to include relevant stakeholders in large size country like India		8
Jamaica	JAM/REF/27/TRA/12	Implementation of RMP: Customs officers training programme	Canada	54,240	Implemented, July 1999	Yes	23 participants trained, completed, June 2000	118 customs officers trained by November 2000, with an additional 75 trained in mini sessions at 11 customs ports through 2001	Yes	Customs training department is continuing training with UNEPs Customs training manual in assistance with Canada and Finland	Yes, Training module on monitoring of imports and exports containing ODS incorporated into Scholarship programme for new recruits (August 2001)		National Environment and Planning Agency/Canada	Yes, 32 months. In part due to delays with legislation, and also to inability of trainers to leave their regular duties	Reduction in imports of equipment containing ODS of approx 60% during last quarters of 2000-2001	3
Jordan	JOR/REF/28/TRA/48	RMP: Customs training	UNIDO	38,003	Implemented		15 customs officers trained	25 customs officers trained	Yes, 8 sets				GCEC, NOU/UNIDO	Yes, 11 months	Project is described as having been smoothly implemented with no significant problems. "satisfactory as planned"	12
Macedonia	MDN/REF/28/TRA/15	RMP: Training of customs officers	UNIDO	30,159		Yes, in Macedonian	299 Customs officers were trained and certified. Original plan called for 32.		Yes, 7 identifiers			Database was created	Agency for Development and Investment, Ministry of Environment and Physical Planning, Ozone Unit/UNIDO	Yes, 12 months, change of government component		5
of Mali	MLI/REF/29/TRA/07	Customs training programme	UNEP	60,000			20 customs officers trained, September 2002	40 customs officers trained, October 2002 to December 2003			Yes, included in customs and excise training curricula of training school			Yes, 30 months, no explanation	Project described as "satisfactory and as planned"?	8
Mongolia	MON/REF/32/TRA/04	Implementation of the RMP: Training of customs officers	UNEP provisional	77,200	Implemented	Yes	33 customs officers and national stakeholders trained. June 2001	259 trained customs officers, enforcement and environmental officers trained. September 2001-May 2003			Yes, for new customs officers and environmental inspectors		National Ozone Unit, Ministry of Environment of Mongolia/UNEP DTIE	Yes, 17 months, in view of training a large number of trainees	Mongolian customs officer participated as lead trainer in Uzbekistan. South/South cooperation model	4
Niger	NER/REF/27/TAS/05	Customs officers training programme	UNEP	63,000			17 Customs officers trained, February 2002	110 customs officers trained, July 2002 to June 2003	Yes		Yes, included in customs and excise training curricula of training school		Bureau national ozone/UNEP	Yes, 38 months, project execution delayed until legislation was passed	"Satisfactory and as planned"?	6
Oman	OMA/REF/34/TRA/04	RMP: Customs training programme	UNIDO	42,000			22 customs officers and officials trained		Yes, 8 identifiers provided				NOU/UNIDO	Yes, 4 months. Signature of agreement took longer than originally foreseen		9
Qatar	QAT/REF/34/TRA/04	RMP: training of customs and ozone unit in monitoring and control of ODS	UNIDO	50,000			40 customs officers trained in addition to NOU staff	15 officers trained	12 identifiers provided				NOU/UNIDO	Yes, 4 months. More officers were identified that required training		9
Romania	ROM/REF/28/TRA/17	RMP: training of customs officers and development of criteria for ODS and ODS consuming equipment	UNIDO	21,000	Implemented		31 officers in customs department and 12 staff of district environmental protection agencies were trained		5 refrigerant identifiers					Yes training wasp delayed more than two years due to lower priority set in customs department		10



## 附件二：已审议的文件

已核准项目的多边基金盘存清单。

执行机构提交的年度项目进度报告。

讲习班报告和项目完成报告。

培训项目和制冷剂管理计划项目评价，包括这种情况下编制的国家案例研究。

环境规划署海关培训手册、各国海关培训手册及关于政策制定（特别是许可证制度）的一般出版物。

缔约方会议有关专题的决定和报告，特别是监测国际贸易和防止含消耗臭氧层物质的消耗臭氧层物质混合物与产品的研究报告（第 XIII/12 号决定，UNEP/OzL.Pro/WG.1/22/4 号文件）。

关于监测消耗臭氧层物质贸易和防止消耗臭氧层物质非法贸易的 UNEP/OzL.Pro/ExCom/43/58 号文件（关于监测国际贸易与防止消耗臭氧层物质、含消耗臭氧层物质的混合物和产品非法贸易的决定（第 XIV/7 号决定）），及其两个附件。

《蒙特利尔议定书》下的许可证制度和海关官员培训，2004 年 6 月由环境规划署/技工经司编制，2004 年 8 月修订。

截至 2004 年 8 月环境规划署项目情况概览，由环境规划署/技工经司编制。



### Annex III: Checklist of Questions for Field Visits

#### 1. General information

Issue	Source of information		
	NOU	Industry	Customs
1. Consumption of ODS (recent data):	X		
2. Sources of ODS consumption data and their reliability	X		
3. Estimated share of sectors in ODS consumption:	X		
4. Status of CP and RMP implementation	X		
5. Import licensing system in place since _____	X		

#### 2. Import licensing system (ILS)

Issue	Source of information		
	NOU	Industry	Customs
6. Authority responsibility for operating the ILS	X		
7. Support received by Multilateral Fund: (a) Through project funding under RMP (b) Through project funding under institutional strengthening (c) Through networking/CAP team	Text		
8. Main regulations and prescriptions of the legal act governing the ILS: (a) Surveillance: _____ (b) Measures to reduce consumption: _____	Text		
9. Any delays in developing and approving the licensing system? If yes, what are the reasons?	X		
10. Specific prescriptions of legislation: (a) Ban of ODS: _____ (b) Ban of equipment containing ODS: _____ (c) Notification requirement: _____ (d) Labeling requirement: _____ (e) Registration of importers compulsory? (f) List of registered importers	X		
11. Mechanism of quota allocations to registered importers	X		
12. Quotas allocated in conformity with the phase-out timetable?	X	X	
13. End user control taking place? (a) Ban for certain applications? _____ (b) Control of ODS emission? _____ (c) Restriction on rights to handle ODS to certified technicians? _____	X		

Issue	Source of information		
	NOU	Industry	Customs
(d) Inspection of distributors or servicing workshops? (e) Surveys conducted among importers/distributors/wholesalers?			
14. Are licenses coupled with certain conditions? (a) Regular reporting to NOU: _____ (b) Record keeping: _____ (c) Restriction on sales: _____ (d) Clearance before shipments: _____ (e) Restrictions on re-export: _____ (f) Labeling: _____	X	X	
15. Imports from non-Parties regulated? (a) If so, how? _____	X		X
16. Sanctions/penalties imposed on violation of legal prescriptions? (a) If so, specify: _____ (b) Mechanisms and capacities for prosecution and enforcement	X	X	X
17. How to deal with illegal imports? (a) Sending back? _____ (b) Auction/selling? _____ (c) Destruction? _____ (d) Storage? _____	X		X
18. Regulations concerning ODS containing applications (e.g. 2 <sup>nd</sup> hand refrigerators, cars, etc.)? Specify: _____ _____	X		X
19. Regulations regarding imports and exports of recovered, recycled and reclaimed ODS?	X		
20. Are imports of ODS containing equipments controlled although they are not controlled under the Montreal Protocol (like cars with MAC using CFC or halon fire extinguishers)?	X		X
21. Effective registered imports of ODS since the introduction of ILS	Figures		
22. Form and frequency of cooperation with stakeholders, especially registered importers. Please give details and assessment.	X	X	



### 3. Customs procedures

Issue	Source of information		
	NOU	Industry	Customs
23. How do customs proceed in controlling imports of ODS or ODS based equipment? (Checking import licenses, permits, customs codes, i.e. all relevant documents): _____			X
24. How do customs proceed in case of suspicious shipments containing possibly ODS? (a) Sampling of containers/cylinders: _____ (b) What sampling method is applied: _____ (c) Physical check with identifiers: _____ (d) Sending shipment to chemical analysis: _____ (e) Notifying NOU or other department: _____			X
25. Some mixtures are difficult to identify through conventional identifier kits. How do customs proceed in such cases to detect the content of such shipments? 26. When does a container/cylinder appear as suspicious? 27. Is every suspicious shipment subject to analysis, or sampling is applied? _____ 28. In which cases do you consider that a chemical analysis is needed? _____			X
29. Did identifier supplied prove to be adequate to detect controlled substances? - Please, specify experience so far: _____			X
30. Which authority is designated within the customs to ensure that import control procedures are followed? _____ _____			X
31. Does a national code system additional to the WCO-HS exist to identify different ODS substances (2 more digits)? _____			X
32. Main problems or difficulties (if any) registered in controlling ODS imports			X
33. What kind of forms are used to monitor imports? _____ _____	X		X
34. Can import figures of ODS substances be made available by customs authority?			X
35. Does customs collect statistical data on every ODS import, or does it use a sort of sampling method? _____ _____			X

Issue	Source of information		
	NOU	Industry	Customs
36. In case of suspicious or clearly illegal imports of ODS, to whom customs authorities have to report to get feedback on how to handle the detained product?	X		X
37. Have customs actually detected illegal imports since legislation and import licensing system is in force? (a) If so, provide quantity of ODS import for a given period of time, e.g. last year: _____			X
38. If illegal imports have effectively been detected, which routes for illegal trade were practiced: (a) Unmonitored crossing point: _____ (b) Concealment of ODS in the midst of legitimate cargo: _____ (c) Mislabeling: _____ (d) Diversion of good in transit: _____			X
39. Is there some evidence that combating illegal trade by customs has contributed to the reduction of ODS consumption in recent years?	X	X	X

#### 4. Customs training

Issue	Source of information		
	NOU	Industry	Customs
40. Has Phase I (train the trainers) been completed? (a) Date of completion: _____ (b) Trainers trained (numbers): _____ (c) Trainers active at present: _____ (d) Reasons for delays, if applicable: _____	X		X
41. Training of customs officers: (a) Training courses completed (numbers): _____ (b) No. of customs officers trained: _____ (c) Number of customs officers in the country: _____ (d) Turnover rate (average): _____ (e) Other stakeholders trained? _____	X		X
42. Is customs training ongoing (e.g. for newcomers, follow-up, etc)? (a) If so, please provide details: _____ _____	X		X
43. Which training materials were used in Phase I and II and what is their usefulness? (a) Country handbook: _____ (b) UNEP customs training material: _____ (c) Other training materials: _____	X		X

44. Did NOU or/and Customs Dept. receive more reports from customs check-points on attempts of illegal ODS import (chemicals or ODS based equipment) after completion of the training courses? (a) If so, specify: _____	X		X
45. Has communication between customs and NOU or other responsible authorities improved after completion of the training courses? (a) If so, specify: _____ (b) Does the NOU regularly take part in training of new customs officers? _____ (c) Are lists on licenses issued distributed to customs? _____			
46. Were identifiers supplied to customs under the RMP? (a) Total no. of identifiers received: _____ (b) No. of customs check-points in the country: _____ (c) No. of identifiers to individual check-points: _____ (d) What sort of identifiers provided? _____ (e) Were other identifiers supplied by national authorities? _____	X		X
47. Did NOU or Customs Dept. receive any reports on using the identifiers by customs? _____	X		X
48. Is your country a member of a: (a) Customs union? _____ (b) Free trade zone? _____ (c) Preferential trade area? _____	X		X
49. Who are the main suppliers of your imports of ODS? _____	X	X	X

## 5. Additional measures to reduce ODS consumption

Issue	Source of information		
	NOU	Industry	Customs
50. Market prices for: (a) CFC-11 (b) CFC-12 (c) R-134a (d) HCFC (e) HC	X	X	
51. Trend in price relations. Has a relevant change in prices been observed? _____	X	X	
52. Have direct measures been introduced to change price relations? (Economic incentives/disincentives) (a) Import duties (b) Taxes (c) Tax exemptions for substitutes	X	X	

Issue	Source of information		
	NOU	Industry	Customs
53. Other measures introduced to reduce ODS consumption: _____	X	X	
54. Have surveys, inspections (at the level of importers, distributors, service shops or end-users) taken place?	X	X	
55. Any other comments and suggestions: _____ _____	X	X	X

## 6. Regional co-operation

Issue	Source of information		
	NOU	Industry	Customs
56. Do you believe that improving communication and cooperation on ODS trade between neighboring countries has helped your country to prevent and combat illegal trade in ODS?  (a) Please, specify experience: _____ _____	X		X
57. Has the Regional Network facilitated such contacts? Please specify: _____			
58. Has there been sub-regional cooperation with neighbouring countries?			

## 附件四：罗马尼亚和塞内加尔实地访问期间的调查结果摘要

### (a) 罗马尼亚

1. 为了履行《蒙特利尔议定书》的《蒙特利尔修正案》，罗马尼亚已引入一项进口许可证制度，据此设定了消耗臭氧层物质进口年度配额。进口消耗臭氧层物质和持有经济贸易部颁发的证件的任何注册公司可申请许可证，在罗马尼亚称为“环境许可证”。这类许可证有效期为一年。目前，有 7 家公司受益于氟氯化碳进口许可证。据报告，国别配额尚未完全使用。氟氯化碳消费量在 2001 年减至 190 ODP 吨（占 675.8 ODP 吨基准的 28%），但 2003 年又增加到 362 ODP 吨（占基准的 53%），这归因于预计的预期进口限额储存。

2. 就防止或减少非法进口的进口许可证制度而言，不可能得到确切的回答。消极的记录是否因不存在非法进口物或未发现非法进口物而引起尚不明确。然而，进口许可证制度的引入产生了一些重要的有益影响：

- (a) 使国家臭氧机构能够改进对消耗臭氧层物质进口和消费的控制，
- (b) 为行业提供可靠的依据，
- (c) 通过控制机制和罚款确定非法进口的抑制措施，
- (d) 产生透明度并由此使相竞的业务公司产生更安全的感觉，
- (e) 改进监测机制和与此相关的统计数据可靠性，
- (f) 推动与注册进口商更好地交流与合作。

3. 根据制冷剂管理计划，正在执行一项海关官员培训方案，有 31 位海关官员和地方环境保护机构的 12 名工作人员参加培训。项目批准和预计完成的日期为 2001 年 10 月，但因行政问题实际完成时间延迟到 2002 年 8 月，并且根据项目完成报告，这也可能因为“政府海关部门将其列入较次的优先地位”。项目完成报告将该培训项目称为“令人满意，尽管不如原计划”。除根据制冷剂管理计划执行的培训项目外，国家臭氧机构在环境规划署和欧洲联盟委员会的协助下还组织了两次海关培训讲习班。中央海关当局参加了这些讲习班；然而由于未做充分准备并且缺乏人力和财政资源，它显然不具备建设开展后继培训活动的国内能力的条件。因此，所有在实地访问期间会见的专家取得了一致意见：有必要更努力地开展更多海关培训活动。

4. 根据制冷剂管理计划，向海关供应了六个识别工具包（五个供海关使用，一个用于培训技术人员）。这些工具主要用作培训，只有例外情况下用于识别装运的货物。虽然海关部门已排除消耗臭氧层物质非法进口的发生率，但有些进口商报告，他们不能放弃跨越黑海或一些边境控制点的某些走私行为，但数量可能很少。

### (b) 塞内加尔

5. 根据《蒙特利尔议定书》的《蒙特利尔修正案》，塞内加尔已引入进口许可证制度，据此设定了消耗臭氧层物质进口年度配额。国家臭氧机构负责在可能的进口商之间分配配额。为使之有效，进口申请需要由环境理事会和国家贸易理事会加盖公章。目前，有 5 家公司受益于氟氯化碳-12 进口许可证。2003 年，已分配 40 公吨，在 2004 年却降到 30 公

吨。据报告，分配配额已完全使用。塞内加尔在很大程度上提前减少了要求在 2005 年减少的 50%，2003 年消费量符合第七条数据中 32.7% 的基准。

6. 与进口商和制冷技术人员协会全面合作的许可证制度已促进了这一目标的实现。贸易商和工场仅保留短期库存以限制相关财政费用。没有在海关入关点缴获氟氯化碳的事件报告。然而，据国家臭氧机构和制冷技术人员称，在一些工场发现了一定数量的非法进口消耗臭氧层物质。

7. 据报告，制冷剂管理计划规定的海关培训部分（由环境规划署执行的项目 SEN/REF/33/TAS/15）令人满意。然而，最初开办研究班将高级海关官员培训为培训员后，原计划为各区域海关官员继续开办四个培训班，但只举办了两个，原因是仅能为组织这类研究班建立与区域性海关当局的合作，而非与中央海关当局的合作。所交付的识别器保存在中央海关仓库，并未用于海关控制。临时将一位培训员从其达卡之外的任职地点召回，以协助确认抵达达卡港的可疑装运货物。

8. 频繁调动受训为培训员的海关官员已严重影响培训活动的继续进行，并且迄今为止尚无与消耗臭氧层物质有关的模块纳入海关学校的课程。已讨论的替代模式包括一小部分致力于消耗臭氧层物质控制的海关官员的特殊作用，或支持一旦有可疑装运货物即被召来的私营行业技术人员。有关这类替代模式的某些功能问题必须加以处理，但这些问题相对于调动受训培训员及其随后无法利用所产生的问题来说只是小问题。

**Annex V:**  
**Statistical Overview of Approved and Completed Projects**  
**Table 1: Customs Training/Licensing Systems and Related Projects**

Category	No. of Projects Approved	No. of Projects Completed	Total Funds Approved (US\$)*	Total Funds Disbursed (US\$)*	PCRs Received
Customs Training Stand-Alone Projects	6	2	630,900	238,885	2
Individual Customs Training Projects that are part of RMPs	58	24	3,058,116	1,348,505	24
Customs Training and Licensing Training integrated in RMP Projects	23	5	3,455,961	583,359	5
Regional Customs Training Projects	6	4	1,137,429	1,047,429	3
Licensing System Stand-Alone Projects	4	2	2,203,900	2,006,570	1
Regional Licensing System Projects	8	7	5,025,411	4,793,166	1
Individual Licensing Systems that are part of RMP Projects	22	7	995,210	332,167	5
Customs Training, Licensing System and ODS Monitoring in National Phase-Out Plans	32	7	51,650,407	5,608,917	0
<b>Total</b>	<b>159</b>	<b>58</b>	<b>68,157,334</b>	<b>15,958,998</b>	<b>41</b>

\* When no separate project numbers are available, the total budget for the RMP or NPP is given which is used only to a small extent for customs training and import licensing activities.

**Table 2: Customs Training Projects Approved by Agency**

Category	Australia	Canada	Finland	France	Germany	Poland	UNDP	UNEP	UNIDO	Total
Customs Training Stand-Alone Projects		1						5		6
Individual Customs Training Projects that are part of RMPs		7	1	2		1	1	41	5	58
Customs Training and Licensing Training integrated in RMP Projects	8	1		1	2			3	8	23
Regional Customs Training Projects		2	1		1			2		6
<b>Total</b>	<b>8</b>	<b>11</b>	<b>2</b>	<b>3</b>	<b>3</b>	<b>1</b>	<b>1</b>	<b>51</b>	<b>13</b>	<b>93</b>

**Table 3: Customs Training Projects Approved by Region**

Category	Africa	Asia and the Pacific	Europe	Latin American and the Caribbean	Global	Total
Customs Training Stand-Alone Projects	1	2		3		6
Individual Customs Training Projects that are part of RMPs	23	16	2	17		58
Customs Training and Licensing Training integrated in RMP Projects	9	11	1	2		23
Regional Customs Training Projects					6	6
<b>Total</b>	<b>33</b>	<b>29</b>	<b>3</b>	<b>22</b>	<b>6</b>	<b>93</b>

**Table 4: Customs Training Projects Approved by Country**

Country	Customs Training Stand-Alone Projects	Individual Customs Training Projects that are part of RMPs	Customs Training in RMP Projects	Regional Customs Training Projects	Total
Algeria			3		3
Angola			1		1
Antigua and Barbuda		1			1
Argentina	1				1
Bahrain		1			1
Bangladesh		1			1
Belize			1		1
Benin		1			1
Bolivia		1			1
Burkina Faso		1	1		2
Burundi		2			2
Cambodia		1			1
Cameroon			1		1
Central African Republic		1			1
Chad		1			1
Colombia	1				1
Comoros		1			1
Congo		1			1
Congo, DR		1			1
Costa Rica		1			1
Cote D'Ivoire			1		1
Croatia		1			1
Cuba		1			1
Djibouti		1			1
Dominica		1			1
Dominican Republic		1			1
El Salvador		1			1
Fiji		1			1
Gabon		2			2
Gambia	1				1
Ghana		1			1
Global				6	6
Grenada		1			1
Guatemala		2			2
Guinea		1			1
Guinea-Bissau		1			1
Haiti		1			1
Honduras		1			1
India	1				1
Jamaica		1			1
Jordan		1			1
Kiribati			1		1
Korea, DPR			1		1
Kuwait		1			1
Kyrgyzstan		1			1
Lao, PDR		1			1



Country	Customs Training Stand-Alone Projects	Individual Customs Training Projects that are part of RMPs	Customs Training in RMP Projects	Regional Customs Training Projects	Total
Liberia		1			1
Macedonia		1			1
Maldives		1			1
Mali		1			1
Marshall Islands			1		1
Mauritania		1			1
Micronesia			1		1
Mongolia		1			1
Niger		2			2
Oman		1			1
Pakistan			1		1
Palau			1		1
Panama		1			1
Paraguay			1		1
Peru		1			1
Philippines	1				1
Qatar			1		1
Romania			1		1
Rwanda		1			1
Sierra Leone		1			1
Solomon Islands			1		1
Sri Lanka		1			1
Sudan			1		1
Suriname		1			1
Swaziland			1		1
Syria		1			1
Togo		1			1
Tonga			1		1
Tuvalu			1		1
Uruguay		1			1
Vanuatu			1		1
Venezuela	1				1
Vietnam		1			1
Western Samoa		1			1
Yemen		1			1
<b>Total</b>	<b>6</b>	<b>58</b>	<b>23</b>	<b>6</b>	<b>93</b>

**Table 5a: Implementation Delays for Different Types of Completed Customs Training Projects**

(Based on Original Approved Planned Dates of Completion)

Category	Delays (in Months)						Total
	Early Completion	On Time	1-6	7-12	13-24	25 and More	
Customs Training Stand-Alone Projects					1	1	2
Individual Customs Training Projects that are part of RMPs	1	1	1	4	8	9	24
Customs Training and Licensing Systems integrated in RMP Projects	1		1	1	1	1	5
Regional Customs Training Projects			1	1	2		4
<b>Total</b>	<b>2</b>	<b>1</b>	<b>3</b>	<b>6</b>	<b>12</b>	<b>11</b>	<b>35</b>

**Table 5b: Implementation Delays for Different Types of Completed Customs Training Projects**

(Based on Revised Approved Planned Dates of Completion for Implementation Delays)

Category	Delays (in Months)						Total
	Early Completion	On Time	1-6	7-12	13-24	25 and More	
Customs Training Stand-Alone Projects					1	1	2
Individual Customs Training Projects that are part of RMPs	4	2	2	6	4	6	24
Customs Training and Licensing Systems integrated in RMP Projects	1		1	1	1	1	5
Regional Customs Training Projects			2	1	1		4
<b>Total</b>	<b>5</b>	<b>2</b>	<b>5</b>	<b>8</b>	<b>7</b>	<b>8</b>	<b>35</b>

**Table 6a: Customs Training  
Implementation Delays for Completed Projects by Agency<sup>1</sup>**

(Based on Original Approved Planned Dates of Completion)

Agency	Delays (in Months)						Total
	Early Completion	On Time	1-6	7-12	13-24	25 and More	
Canada				1	4	2	7
Finland					1		1
Poland		1					1
UNEP	2		1	1	6	8	18
UNIDO			2	4	1	1	8
<b>Total</b>	<b>2</b>	<b>1</b>	<b>3</b>	<b>6</b>	<b>12</b>	<b>11</b>	<b>35</b>

**Table 6b Customs Training  
Implementation Delays for Completed Projects by Agency<sup>2</sup>**

(Based on Revised Approved Planned Dates of Completion for Implementation Delays)

Agency	Delays (in Months)						Total
	Early Completion	On Time	1-6	7-12	13-24	25 and More	
Canada	1			1	3	2	7
Finland			1				1
Poland		1					1
UNEP	4	1	2	3	3	5	18
UNIDO			2	4	1	1	8
<b>Total</b>	<b>5</b>	<b>2</b>	<b>5</b>	<b>8</b>	<b>7</b>	<b>8</b>	<b>35</b>

**Table 7: Licensing Systems Projects Approved by Agency**

Category	Canada	Finland	France	Germany	Japan	Sweden	UNDP	UNEP	UNIDO	Total
Licensing System Stand-Alone Projects	1							2	1	4
Regional Licensing System Projects					2	1		5		8
Individual Licensing Systems that are part of RMP Projects	4	1	2	1		1	1	12		22
<b>Total</b>	<b>5</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>19</b>	<b>1</b>	<b>34</b>

<sup>1</sup> Seven completed tranches of National Phase-out Plans, which include the development of Customs Training, are not included here, as the plans are still on-going.

<sup>2</sup> Ditto.

**Table 8: Licensing Systems Projects Approved by Region**

Category	Africa	Asia and the Pacific	Europe	Latin American and the Caribbean	Global	Total
Licensing System Stand-Alone Projects		1	1	2		4
Regional Licensing System Projects		3			5	8
Individual Licensing Systems that are part of RMP Projects	7	3		12		22
<b>Total</b>	<b>7</b>	<b>7</b>	<b>1</b>	<b>14</b>	<b>5</b>	<b>34</b>

**Table 9: Licensing Systems Projects Approved by Country**

Country	Licensing System Stand-Alone Projects	Regional Licensing System Projects	Licensing Systems that are part of RMP Projects	Total
Argentina	1			1
Barbados			1	1
Benin			1	1
Chile			1	1
China	1			1
Costa Rica			1	1
Cote D'Ivoire			1	1
Cuba			1	1
Djibouti			1	1
Egypt			1	1
Gambia			1	1
Georgia	1			1
Global		5		5
Guatemala			2	2
Guyana			1	1
Lao, PDR			1	1
Madagascar			1	1
Mali			1	1
Nepal			1	1
Nicaragua			1	1
Peru			2	2
Region: ASP		3		3
Suriname			1	1
Uruguay			1	1
Venezuela	1			1
Yemen			1	1
<b>Total</b>	<b>4</b>	<b>8</b>	<b>22</b>	<b>34</b>

**Table 10a: Implementation Delays for Different Types of Completed Licensing System Projects**

(Based on Original Approved Planned Dates of Completion)

Category	Delays (in Months)						Total
	Early Completion	On Time	1-6	7-12	13-24	25 and More	
Licensing System Stand-Alone Projects		1		1			2
Regional Licensing System Projects		3	3			1	7
Individual Licensing Systems that are part of RMP Projects			1	1	5		7
<b>Total</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>5</b>	<b>1</b>	<b>16</b>

**Table 10b: Implementation Delays for Different Types of Completed Licensing System Projects**

(Based on Revised Approved Planned Dates of Completion for Implementation Delays)

Category	Delays (in Months)						Total
	Early Completion	On Time	1-6	7-12	13-24	25 and More	
Licensing System Stand-Alone Projects		1		1			2
Regional Licensing System Projects		3	3			1	7
Individual Licensing Systems that are part of RMP Projects			1	1	5		7
<b>Total</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>5</b>	<b>1</b>	<b>16</b>

**Table 11a: Licensing Systems  
Implementation Delays for Completed Projects by Agency<sup>3</sup>**

(Based on Original Approved Planned Dates of Completion)

Agency	Delays (in Months)						Total
	Early Completion	On Time	1-6	7-12	13-24	25 and More	
Canada			1	2	1		4
Japan			2				2
Sweden			1				1
UNEP		3			4	1	8
UNIDO		1					1
<b>Total</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>5</b>	<b>1</b>	<b>16</b>

**Table 11b: Licensing Systems  
Implementation Delays for Completed Projects by Agency<sup>4</sup>**

(Based on Revised Approved Planned Dates of Completion for Implementation Delays)

Agency	Delays (in Months)						Total
	Early Completion	On Time	1-6	7-12	13-24	25 and More	
Canada			1	2	1		4
Japan			2				2
Sweden			1				1
UNEP		3			4	1	8
UNIDO		1					1
<b>Total</b>	<b>0</b>	<b>4</b>	<b>4</b>	<b>2</b>	<b>5</b>	<b>1</b>	<b>16</b>

<sup>3</sup> Seven completed tranches of National Phase-out Plans, which include the development of licensing systems, are not included here, as the plans are still on-going.

<sup>4</sup> Seven completed tranches of National Phase-out Plans, which include the development of licensing systems, are not included here, as the plans are still on-going.

# New 5-day mixed approach

Monday Phase I	Tuesday Phase II	Wednesday Preparation	Thursday Phase II	Friday Phase II
Deliver of Phase I training by UNEP staff	Preparation of Phase II training by UNEP staff	Preparation of local trainers	Phase II training group 1	Phase II training group 2
10 trained trainers	10 trained stakeholders	1 training skills	40 trained customs officers	40 trained customs officers

- Immediate output of up to 50 trained customs officers and 10 stakeholders
- Immediate initiation of Phase II training
- Improved training skills of local customs trainers
- Supervision and monitoring of Phase II training
- Evaluation of local trainer's performance
- Flexibility to adapt to country needs
- Demanding logistics for NOUs to involve 60 participants