



Survey Report on Customs Consultant



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Ping's Comments on Customs Affairs is a WeChat Official Account run by Mr. Jiang Xiaoping, the founding director of Beijing Re-Code Trade Security and Facilitation Research Centre. As an expert in customs affairs and a former customs officer, Mr. Jiang has published many widely-applauded reviews on this platform.

According to 3.1, Article 1 of the WTO Trade Facilitation Agreement: Each Member shall, within its available resources, establish or maintain one or more enquiry points to answer reasonable enquiries of governments, traders, and other interested parties on matters covered by paragraph 1.1 and to provide the required forms and documents referred to in subparagraph 1.1(a).

The General Administration of Customs of China (GACC, the headquarters) and Customs Districts have set up the "business consultation" column on the official websites accordingly. According to statistics, from January 1 to June 18 this year, 5,126 business cases were accepted and handled through this channel by GACC and Customs Districts.

In order to understand the feedback from the Customs Districts at the main shipping ports to the business consultations submitted by the company through the website, Beijing Recode Research Center conducted a test survey with a method similar to blind test (without pre informing to the tested parties).

Test locations

Customs Districts in Dalian, Tianjin, Qingdao, Shanghai, Ningbo, Xiamen, Zhuhai, Guangzhou, Huangpu, and Shenzhen.

Question

Our company acts as an agent for a customer to export a piece of equipment that

needs to be exported abroad for maintenance. Our company consulted with the on-site customs officer, with the answer that when the item is re-imported, the commodity code (9022120000) is an old mechanical and electrical product that is prohibited from being imported according to relevant regulations. The country prohibits any form of import of this kind product, so for this reason, the equipment cannot be exported abroad for maintenance.

But when we consulted with the officer of the Commodity Inspection Department the answer was that the device exported for repair then was re-imported shall be regarded as special trade, so it should be imported and allowed to export for maintenance.

QUESTION: Is it allowed to import such goods after being repaired abroad? If allowed, how to go through the formalities?

Feedback

FEEDBACK MODE

Feedback via **Email:** Tianjin, Guangzhou, Shanghai, Dalian, Shenzhen

Feedback via **Telephone:** Ningbo, Zhuhai, Xiamen

Feedback via **Message:** Qingdao, Whampoa

REPLY TIME

Within **1 day:** Tianjin, Qingdao

In **2 days:** Ningbo, Guangzhou, Zhuhai, Huangpu, Shanghai

More than **4 days:** Dalian, Shenzhen, Xiamen

QUALITY OF RESPONSE

The feedback content was roughly assessed in terms of whether the exact answer was given, whether the basis of policies and regulations were provided, or the solution idea and operation road were proposed. The ports with satisfactory reply were Zhuhai, Tianjin, Huangpu and Xiamen.

Reflections and suggestions

1 Twelve years ago, I organized students from University of International Business and Economics to conduct a similar survey on the feedback of 41 Customs Districts nationwide, and the results were as follows: During half a month time, we received feedback from 3 Customs Districts (7%), and only 2 Customs District (4%) provided satisfied feedback. Some customs issues could not even be

submitted. Compared with the current situation, the progress is remarkable.

2 Due to the huge difference in the knowledge level of staff for customs affairs in enterprises, together with various fast changing situations and new problems emerging one after another in the actual work of enterprises, some of which are blind spots or need to be improved in the system itself. Therefore, it is suggested that the Customs make some improvements in the consultation and feedback mechanism.

SPECIFIC RECOMMENDATIONS ARE AS FOLLOWS:

I. All inquiries via internet and telephone could be given corresponding responses through the 12360 hotline. To adopt the front desk consultation and triage mode in large hospitals which is that simple questions can be answered directly, and complicate ones are transferred to experts for further advice.

II. In view of the extensiveness and complexity of the issues involved in the customs matters, a customs consulting expert database including various professionals should be established,, and 12360 is supposed to distribute the questions accordingly to improve the quality of feedback to save public resources;

III. Set frequent consultation replies on the website, and submit the institutional problems encountered in consultation to relevant functional departments for further discussion and identify temporary and long-term improvement measures respectively. While taking consultation as a public service, the Customs should give play to its function as a channel and window to understand the actual situation of import and export of enterprises with a view to constantly realize its perfection.

For further information on the feedbacks of relevant ports, please click on the [Record Form of Feedback of Business Consultation](#) on the Customs Website.

Last but not the least, **THE AIM AND PURPOSE OF OUR RESEARCH CENTER** is to understand and reflect the real situation through objective and scientific methods, and to put forward positive and constructive suggestions for the continuous optimization of the port business environment and the continuous improvement of the national trade facilitation.

Due to the influence of subjective and objective factors, it is inevitable that there are some deficiencies in our work. We sincerely look forward to your kind comments and suggestions from all sectors of society.



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