

2018

Trade Facilitation Taskforce Survey Report

上海美国商会贸易环境
满意度调查报告





The American Chamber of Commerce in Shanghai
上 海 美 国 商 会

About The American Chamber of Commerce in Shanghai

The American Chamber of Commerce in Shanghai (AmCham Shanghai), known as the “Voice of American Business” in China, is one of the largest American Chambers in the Asia-Pacific region. Founded in 1915, AmCham Shanghai was the third American Chamber established outside the United States. As a non-profit, non-partisan business organization, AmCham Shanghai is committed to the principles of free trade, open markets, private enterprise and the unrestricted flow of information.

About AmCham Shanghai's Trade Facilitation Taskforce (TFT)

AmCham Shanghai's Trade Facilitation Taskforce engages Shanghai Customs (Customs) and the China Inspection and Quarantine Services (CIQ) regularly on key issues related to import and export business. In March 2007, the Chamber launched the Customs Taskforce to improve communications between AmCham Shanghai members and Shanghai Customs. In 2012, the Taskforce was renamed the "Trade Facilitation Taskforce" because of the inclusion of CIQ. Each year, AmCham Shanghai invites companies from the manufacturing, logistics and trade sectors to participate in the “Trade Environment Satisfaction Survey.”

关于上海美国商会

上海美国商会被称为在华“美国商业之声”，是亚太地区规模最大的美国商会之一。商会成立于1915年，是第三家设立于美国境外的美国商会。作为一家非盈利性、中立的商业组织，上海美国商会致力于自由贸易政策，市场开放，私有企业和信息的自由流通。上海美国商会的使命是努力通过提供高质量的商务信息与服务，政策游说支持及丰富的商业联系与交流，为会员的成功经营以及美中商贸关系的增进提供支持帮助。

关于上海美国商会贸易便利化工作组

上海美国商会贸易便利化工作组就进出口业务相关问题与上海海关和中国检验检疫局定期接洽。2007年3月，上海美国商会成立海关工作组，旨在改善上海美国商会会员与上海海关之间的沟通。2012年，工作组更名为“贸易便利化工作组”，将检验检疫业务囊括在内。上海美国商会每年都会邀请制造、物流和贸易领域的企业参加“贸易环境满意度调查”。

2018 TFT Survey Report | Contents

I.	Introduction	1
II.	Survey Demographics	2
III.	Challenges: Transparency and Collaboration	5
	A. Transparency	
	B. Collaboration	
IV.	Trade Facilitation Performance:	8
	A. Operational Efficiency	
V.	Key Regulations and Reforms.....	9
	A. Single-window System	
	B. Shanghai Free Trade Zone (FTZ)	
	C. Nationwide Customs Clearance Integration Regime	
	D. Customs/CIQ Merger	
VI.	Expectations and Recommendations	13
I.	摘要	15
II.	受访企业情况.....	16
III.	挑战：政策透明度与部门协作	19
	A. 政策透明度	
	B. 部门协作	
IV.	贸易推进考虑因素	21
	A. 运营效率	
V.	改革与新政	22
	A. 国际贸易单一窗口	
	B. 上海自贸区	
	C. 全国通关一体化改革	
	D. “关检合并”	
VI.	展望与建议	26

I. Introduction

The American Chamber of Commerce in Shanghai's **2018 Trade Environment Satisfaction Report** is based on the 2018 Trade Environment Satisfaction Survey. The survey was conducted in early June and had responses from 70 companies. This report is an integral part of AmCham Shanghai's Trade Facilitation Taskforce (TFT) dialogue with Shanghai Customs and Shanghai China Inspection and Quarantine Services (CIQ). AmCham Shanghai began a special initiative with Shanghai Customs in 2007, and began a parallel dialogue with Shanghai CIQ in 2012. Our annual Trade Environment Satisfaction Report provides concrete feedback and recommendations to improve the trade facilitation environment in Shanghai.

According to this year's survey results, Customs and CIQ have made further progress in lowering costs and reducing clearance times, but transparency and collaboration issues among trade facilitation authorities continue to pose challenges for American companies operating in Shanghai. Most respondents identified the single-window clearance system as the most helpful new reform. In contrast, not a single respondent labeled preferential policies from the Shanghai Free Trade Zone (FTZ) as such. Respondents ranked further fulfillment of the WTO Trade Facilitation Agreement¹ (TFA) and more tangible benefits from qualifying as an Advanced Certified Enterprise / AA enterprise as the top two policies they were looking forward to in 2018.

This survey was taken during a time of heightened regulatory uncertainty. Customs and CIQ were merged after the National People's Congress in March 2018. Survey respondents have high hopes that the merger will lead to less repetitive paperwork, simplified classification procedures and faster clearance times. However, only 38% of respondents reported they had received enough information about enterprise recertification, one of the first measures introduced after the merger. As the merger continues, there will likely be more changes in Customs procedures and regulations that will lead to more ambiguity in the next year. Trade tensions between the United States and China will add to the overall atmosphere of uncertainty, as both governments have introduced punitive tariffs that must be carried out by Customs authorities.

Recommendations

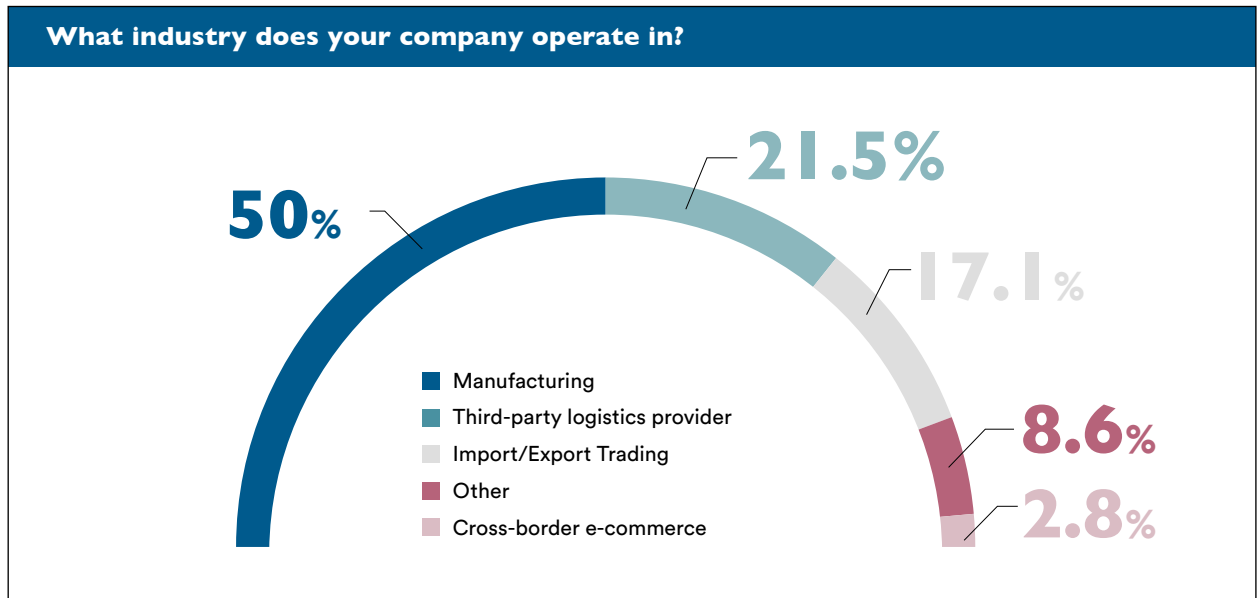
AmCham Shanghai is pleased that Shanghai Customs has made efforts to brief AmCham member companies on Customs policy developments and to seek out the views of the business community. To further facilitate trade, AmCham Shanghai urges that Shanghai Customs continues with additional measures to integrate Customs and CIQ operations beyond single-window declarations, and fully implement the trade facilitation reforms listed in the July 2018 Shanghai "100 Measures" initiative. In addition, more interactions and policy briefings will minimize regulatory uncertainties for companies. We also encourage the central government to play a positive role by introducing more reforms and preferential policies in the Shanghai FTZ and reexamining the possibility of establishing a Free Trade Port (FTP) with significant reforms in Shanghai.

As for our member companies, we recommend they continue to engage with Customs authorities to gain a better understanding of Customs priorities and policies and upgrade their Customs Enterprise Rating to enjoy better trade facilitation measures.

¹ In September 2015, China became the 16th WTO member to formally accept the WTO's Trade Facilitation Agreement (TFA). The Agreement includes provisions to "expedite the movement, release and clearance of goods, including goods in transit". It also intends to enhance the cooperation between different customs and other related authorities on trade facilitation and customs compliance issues.

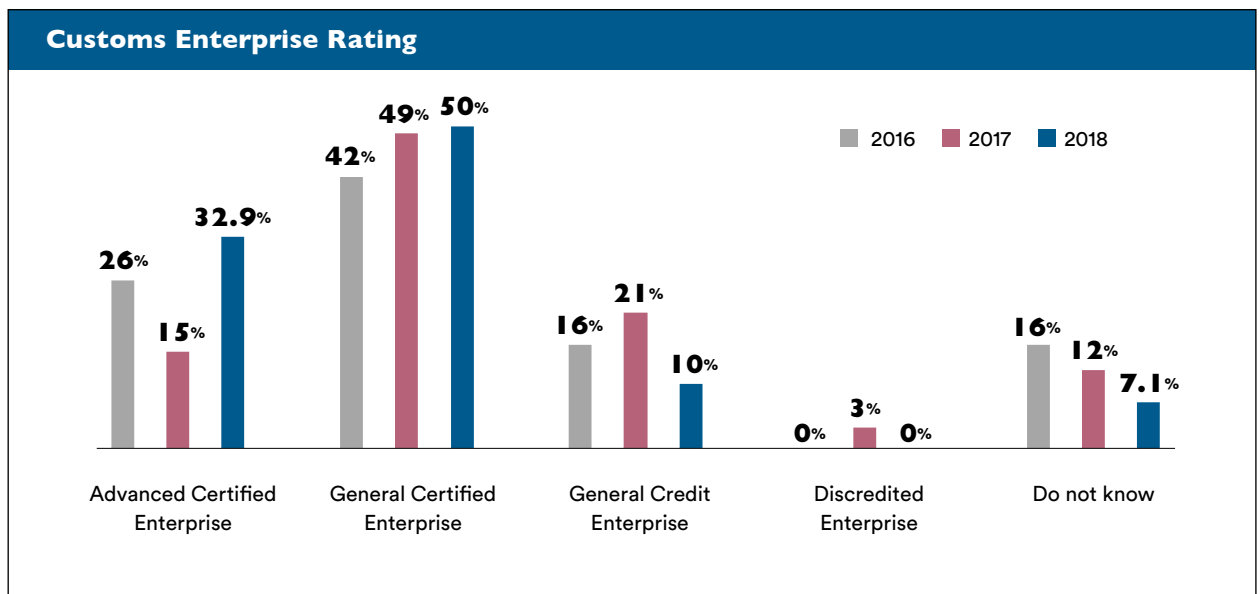
II. Survey Demographics

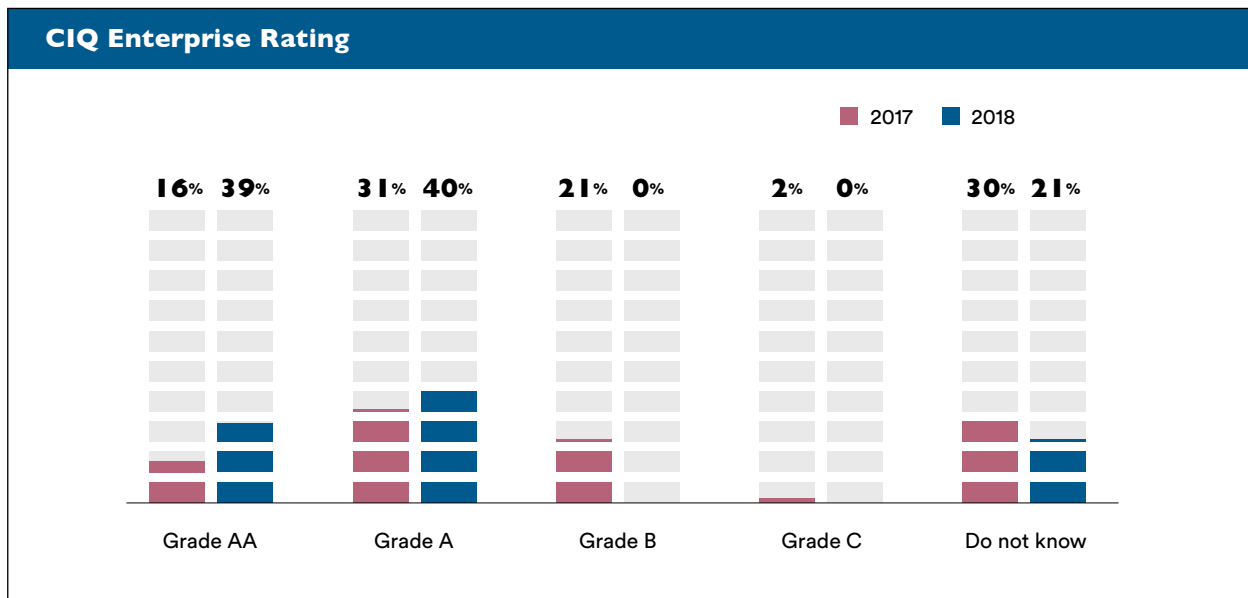
This year's survey was conducted in early June 2018 and received 70 responses. The majority of participants came from the manufacturing sector (50%), followed by third-party logistics providers (21.5%) and the import/export sector (17.1%). A majority (64.3%) of respondents reported revenues exceeding US\$100 million last year and 21.4% reported revenues between US\$10 – US\$50 million.



Enterprise Classification Ratings: Increased Awareness

This year's results show a significant jump in company rating levels in both Customs' and CIQ's enterprise rating systems. Though the largest percentage of respondents remain in the Customs General





Certified Enterprise (50%) and CIQ Grade A level (40%) categories, there was a significant increase in those who have received Advanced Certified Enterprise and CIQ Grade AA level categorization. Companies in these two categories increased from 15% and 16% in 2017 to 32.9% and 39% in 2018, respectively.

Last year a large number of respondents did not know their Customs and CIQ Enterprise ratings (12% and 30%, respectively). These rates dropped to 7.1% and 21% in this year's survey. Understanding and upgrading Customs and CIQ enterprise ratings can help companies decrease risks and improve relationships with related government agencies. More importantly, companies with higher ratings are subject to fewer inspections and receive better services. In last year's report we recommended to our member companies that they understand their ratings and it is encouraging to see that companies have followed that advice.

Authorized Economic Operators (AEO)

In 2014, China adopted the World Customs Organization's (WCO) Authorized Economic Operator (AEO) classification system. AEOs, including Advanced Certified Enterprises and General Certified Enterprises, enjoy mutual recognition and preferential Customs treatment (for example, reduced port handling costs, insurance and logistic fees) from 33 countries/regions (as of December 2017), including 28 EU member states, Singapore, South Korea, Hong Kong SAR, and Switzerland.² China is also actively pursuing AEO mutual recognition agreements with the United States, Japan, Malaysia and countries along its "Belt and Road Initiative (BRI)."³

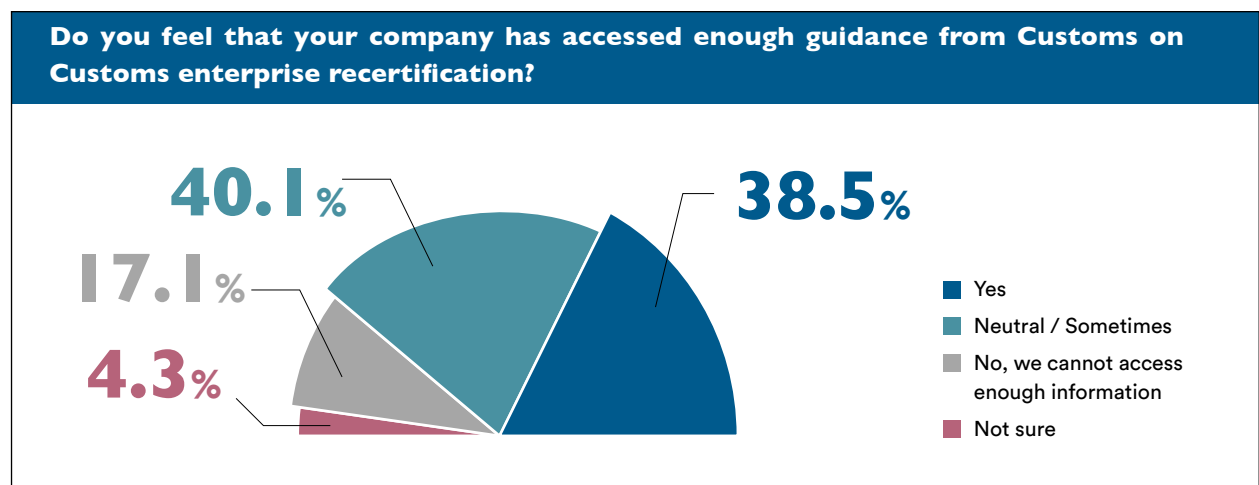
² Sometimes only Advanced Certified Enterprises (ACEs) are recognized in the Mutual Recognition.

³ The Belt and Road Initiative (BRI) is a development strategy first proposed by Chinese President Xi Jinping during his visit to Central Asia in 2013. It aims to promote economic cooperation and connectivity between China, Eurasian and Asia-Pacific countries by interlinking trade deals and infrastructure projects throughout the area.

AEOs also enjoy priority inspection and release, a designated Customs coordinator (an assigned key Customs person of contact for request handling), and joint incentives from other government agencies. As China continues to expand its Customs relationship with other countries through the AEO platform, companies should consider applying for AEO certification and upgrading their Customs ratings. This will enable them to achieve higher clearance efficiency and other potential indirect benefits.

New Classification Measures

In March 2018, China's General Administration of Customs of China (GACC) released the new *Measures for Enterprise Customs Credit Rating* (GACC Order No. 237), which took effect on May 1, 2018, and replaced the previous *Interim Measures* (Order No. 225). The new *Measures* include significant regulatory changes such as requiring companies to submit their enterprise credit information in an annual report and new treatment measures for companies in different categories. The new rules also attempt to bring China's system into closer alignment with the AEO regulations outlined in the WCO framework, which should lead to greater mutual recognition in the future.



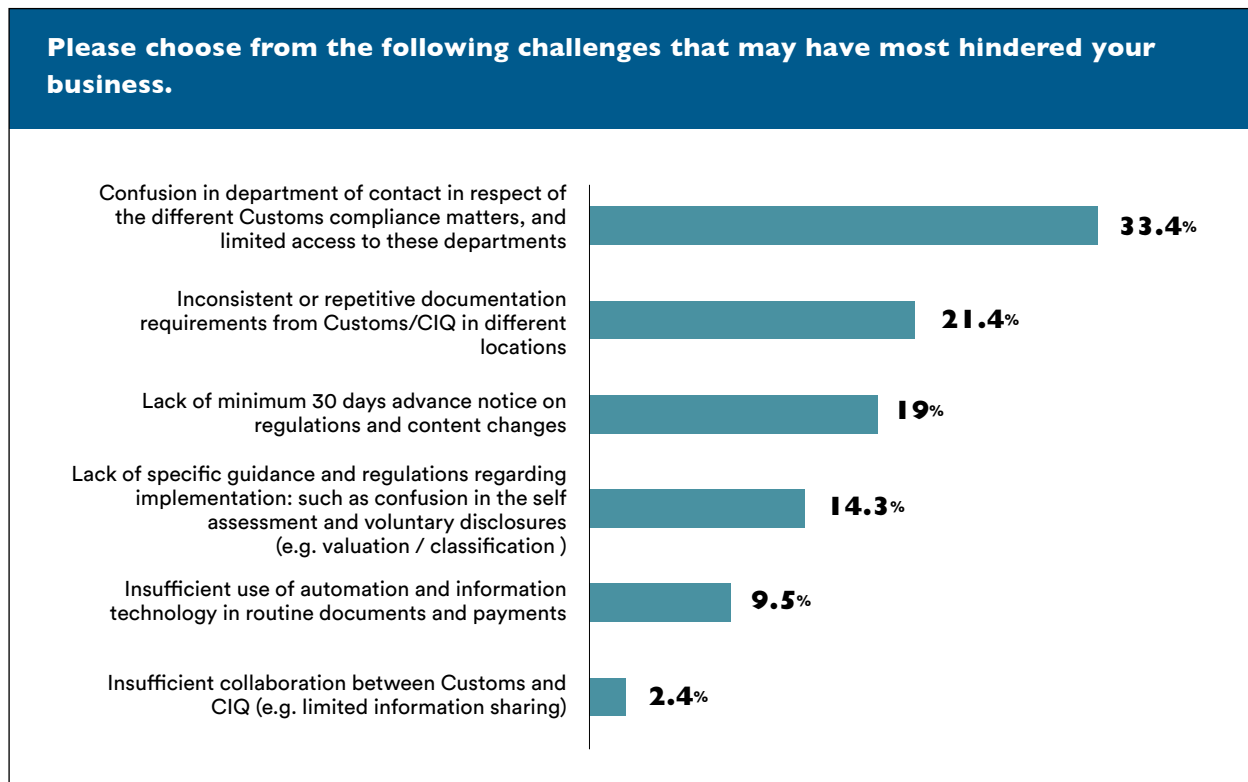
The new regulations clarified some provisions for preferential treatment for companies in different credibility rankings that had been included in the *Interim Measures No. 225*, including “higher,” “reduced” and “simplified.” The *Measures* state that “the average import/export inspection rate (hereafter referred to as “inspection rate”) for Advanced Certified Enterprise will be less than 20% than that of the General Enterprise Enterprises. The inspection rate for General Certified Enterprises will be 50% lower than that for the General Credit Enterprise. At the same time, Discredited Enterprises will be subject to an inspection rate of above 80%.”

By providing preferential treatment (for example, potential exemptions of the guarantee deposit) to certified enterprises and punitive treatment (for example, longer waiting periods for recertification) to discredited enterprises, the *Measures* encourage companies to work toward higher rankings. In addition, the new regulation also introduces a joint supervision system that includes other government agencies such as the State Administration for Industry and Commerce, State Tax Bureau and the Ministry of Ecology and Environment.

Despite Customs efforts, 40% of respondents were ambivalent about whether they had enough information on this joint supervision system. Only 38% said they were able to obtain enough guidance from Customs on the enterprise recertification process, while 17% said they could not access enough information. Customs should continue to promote the measures and enhance the transparency and effectiveness of these new policies.

III. Challenges: Transparency and Collaboration

This is the first year our survey asked respondents to rank the challenges they faced. It shows that confusion over the person/department of contact for different Customs compliance matters and limited access to these departments are the top challenges for member companies. Other challenges included inconsistent or repetitive documentation requirements from Customs/CIQ in different locations, and failure to respect the minimum 30-day advance notice on regulation and content changes. We believe there will be improvement as Customs moves forward with its restructuring plan and introduces more integrated measures.



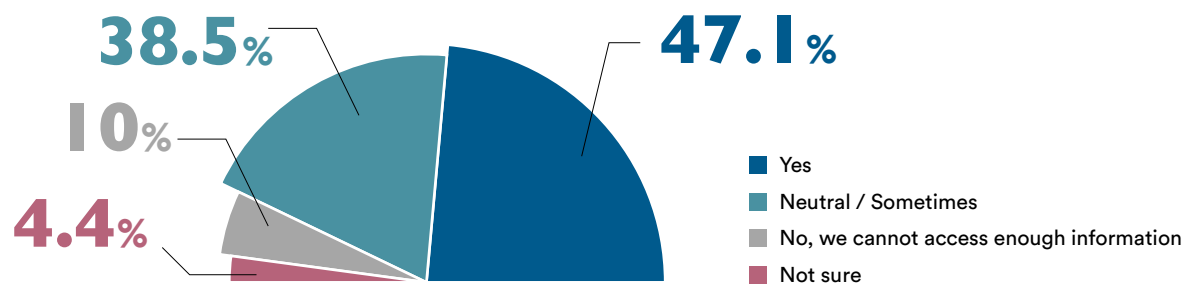
A. Transparency

A sizeable portion of respondents (47.1% and 42.9% respectively) indicated that both Shanghai Customs and Shanghai CIQ were more transparent, efficient and predictable compared to last year. On the other

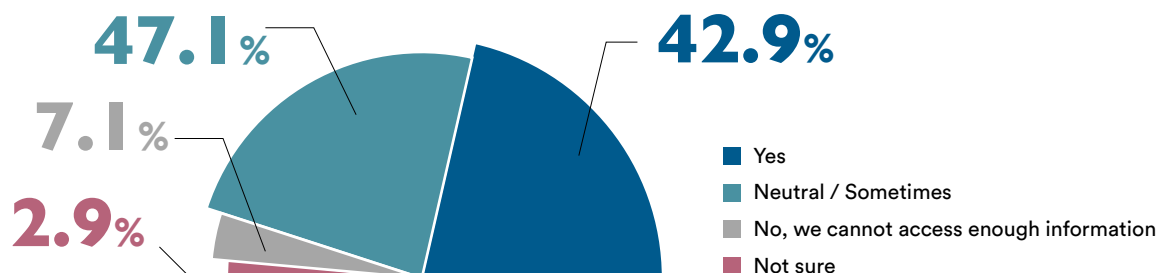
hand, only 50% of respondents felt they were able to access sufficient information (for example, relevant laws, regulations and administrative rulings) through Shanghai Customs' and CIQ's websites, as well as other public information platforms. This was a drop from last year (70%) and a return to the level seen two years ago (53%).

We asked our member companies about this change and they attributed the backward movement to the lack of "timely policy updates" and "detailed implementation information." They also urged that Customs provide more guidance on non-tariff requirements. This type of information will become especially important as Customs undergoes its massive restructuring.

Compared with last year, do you think your routine dealings with Shanghai Customs have become more transparent, efficient, and predictable?

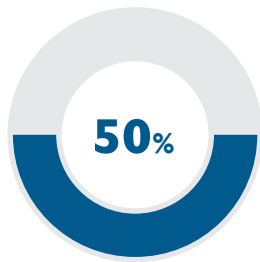


Compared with last year, do you think your routine dealings with Shanghai CIQ have become more transparent, efficient, and predictable?

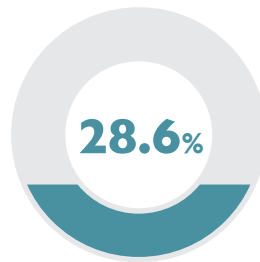




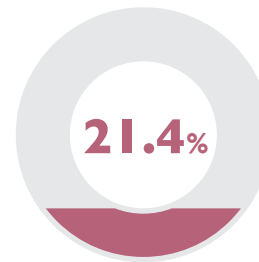
Is your company able to access sufficient necessary information from Shanghai Customs and CIQ (for example, application procedures) online, or through other public information platforms?



Yes



Not sure

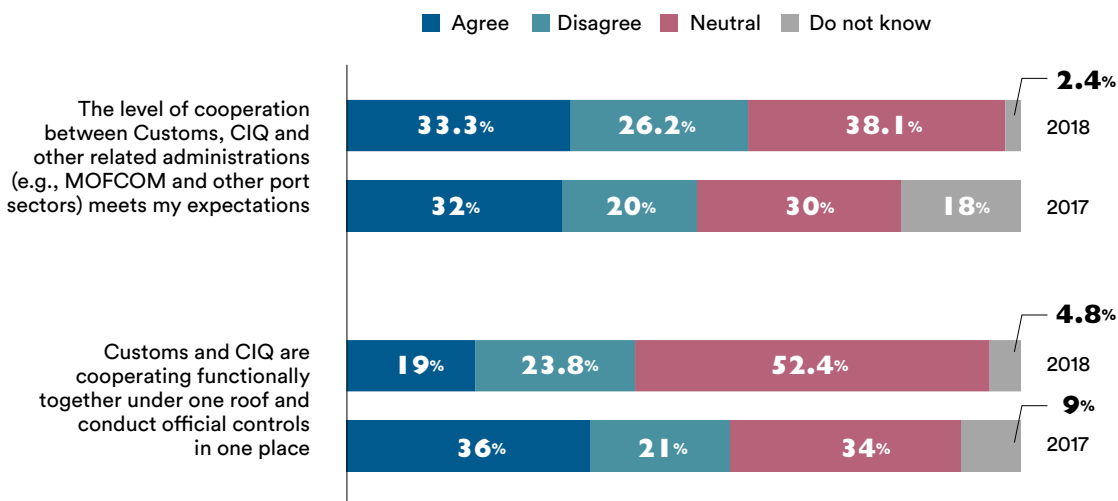


No, it's not sufficient

B. Collaboration

For many years, companies have pushed for improved collaboration and coordination among Customs and CIQ as well as among different regional Customs offices. Survey respondents continue to believe that improvement is needed in this area. Only 31% feel different Customs authorities across China are willing to work together, 36% said that the level of cooperation met expectations and 33% reported that documents are not repetitive. There was also a sharp decrease in those who felt that Customs and CIQ are working together under one roof and conducting official controls in one place. Members expect this coordination to improve with the merger and 64.3% believe that it will lead to improved efficiencies in clearance costs and times.

Attitudes toward collaborations between Shanghai Customs, CIQ and other related agencies

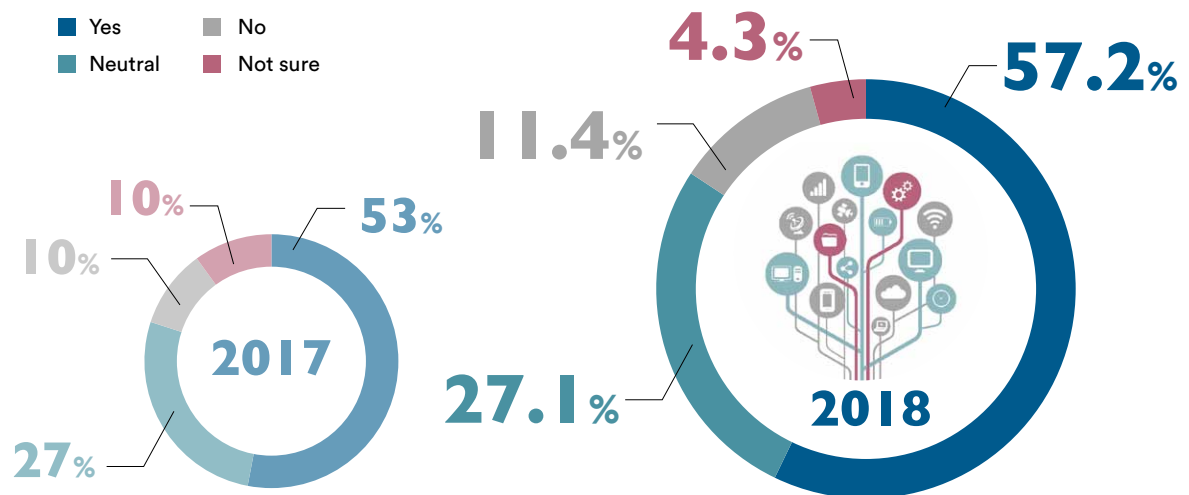


IV. Trade Facilitation Performance

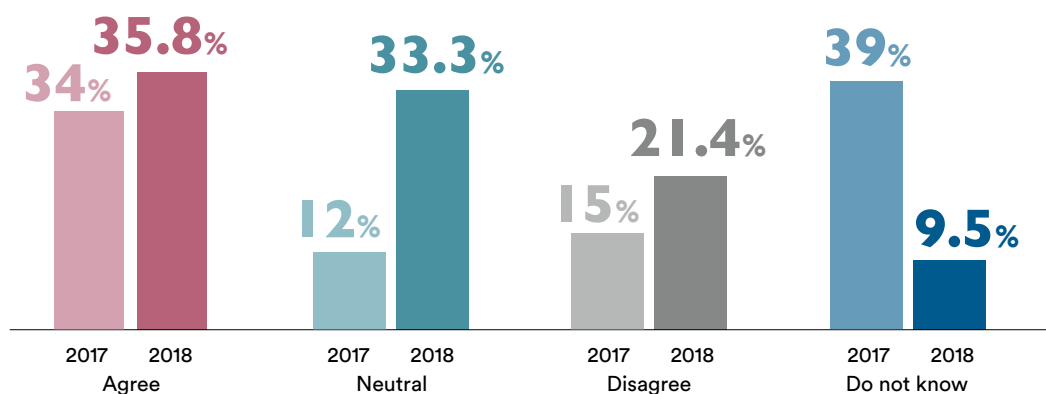
A. Operational Efficiency

Satisfaction levels regarding automation and cost savings improved slightly. A majority (57.2%) of respondents agreed that sufficient automation and information technology adoption has taken place in their routine import/export transactions (for example, duties and other fees), scoring a slightly higher rate than last year (53%).

Do you agree that sufficient automation and use of information technology have taken place in your company's routine import/export transactions (for example, duties and other fees)?



Do you agree that the cost you incur in Shanghai due to clearance time uncertainty (for example, holding additional inventory, carrying cost of capital and transaction-based inspections), is lower compared to that in elsewhere in China?

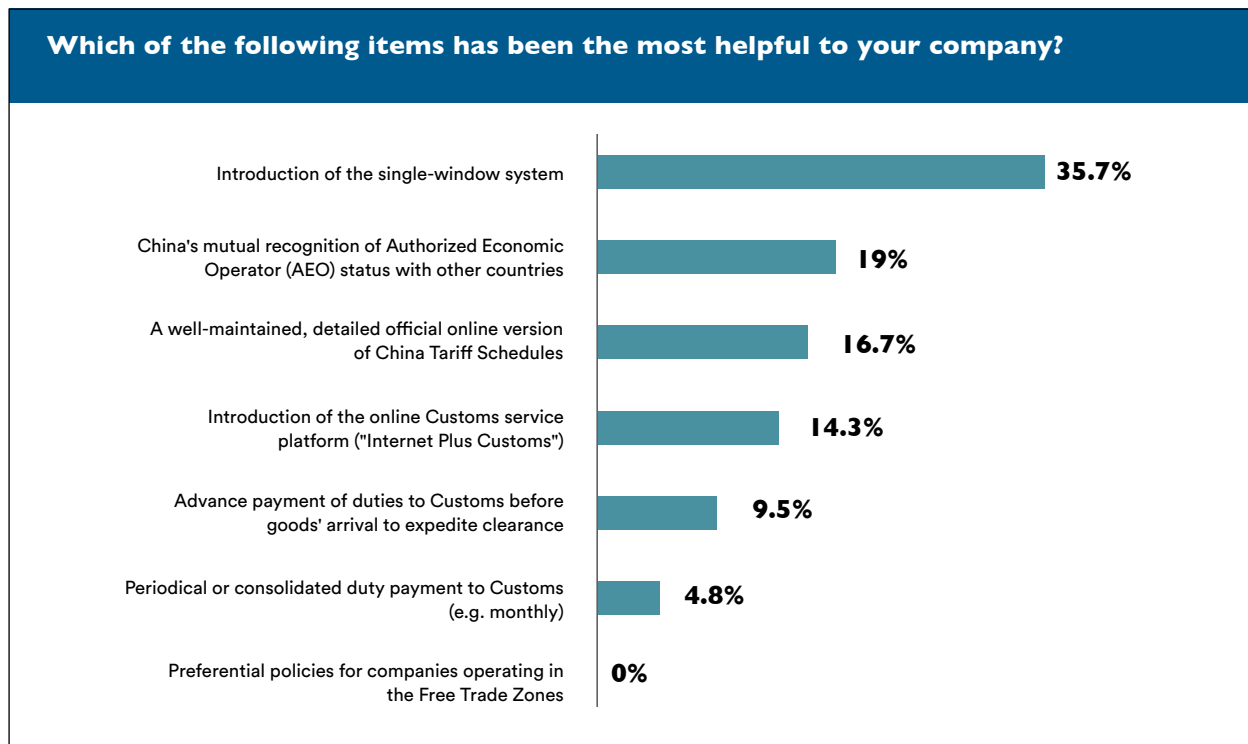


There was also a small increase in the percentage of respondents who agreed that “the cost they encounter in Shanghai due to clearance time uncertainty (for example, holding additional inventory, carrying cost of capital- and transaction-based inspections) is lower than elsewhere in China.” This year’s rate was 35.7% compared to last year’s 34%. However, there was an increase (21.4% from last year’s 15%) of those who disagreed that costs were lower in Shanghai. This change could be the result of GACC’s efforts to standardize procedures and operations of regional Customs offices under the Nationwide Customs Clearance Integration Regime (see more about this program in section V. (C) below).

V. Key Regulations and Reforms

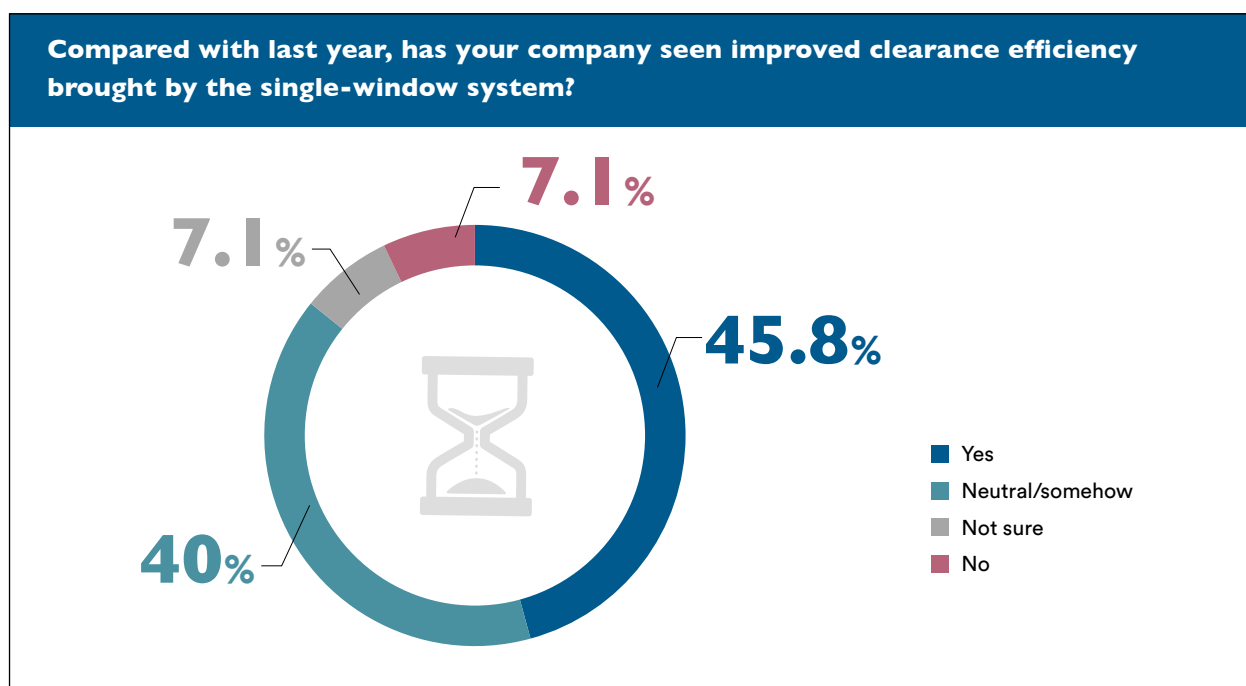
The GACC and Shanghai Customs have introduced numerous reforms in the past few years to facilitate trade in Shanghai. Some reforms like the single-window system have had a positive impact, while others, like the FTZ, have had fewer tangible benefits. This section examines the views of respondents on these key reform programs.

When asked which regulations or reforms have been the most helpful, the single-window system was by far the top choice (35.7%). The next two most popular were China’s mutual recognition of AEO status with other countries (19%) and a well-maintained, detailed official online version of China Tariff Schedules (16.7%). None of the respondents identified “preferential policies for companies operating in the Free Trade Zones” as the most helpful reform.



A. Single-window System

The single-window system was implemented nationwide in November 2017. To improve customs clearance efficiency and reduce costs, it enables companies to declare cargo and taxes in one submission through a new online platform. Under the new scheme, companies no longer need to submit duplicative trade documents to 11 different authorities including Customs, Immigration Inspection, Inspection and Quarantine, China Maritime Safety Administration (MSA) and other departments. All these authorities can access and share companies' declaration data, logistical control information and credit standings. The reform is an effort by the central government to provide coordinated and standardized services from different departments.



B. Shanghai Free Trade Zone (FTZ)

Despite the Shanghai government's renewed efforts, the FTZ continues to slip in importance to AmCham Shanghai member companies. As noted above, not a single respondent in this year's survey said that "preferential policies for companies in the FTZ" was the most helpful reform. As China's first mainland FTZ, the Shanghai FTZ was established in 2013 with high expectations as a testing ground for reforms. Indeed, the Shanghai FTZ did generate important reforms, such as reduced customs duties and streamlined clearance processes, the single-window system, Free Trade Accounts and the introduction of a negative list approach to investment. Once proven in the FTZ, these reforms were then extended outside the zone. Ironically, this had the result of reducing what was special about the FTZ. This helps explain the low ranking of the FTZ in our survey.

In late 2017, Shanghai revealed an intent to establish a Free Trade Port (FTP) with "the highest international standards." As announced by the municipal government, FTP would become an upgraded

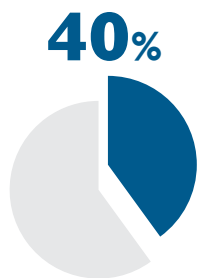
form of FTZ, and technically be an “offshore territory,” which would allow more freedom in trade, investment, financing and shipping/transportation. It would go further than the FTZ with more relaxed capital controls, free customs duties and minimal clearance procedures. In April, China’s southernmost province Hainan announced it would establish an FTZ and develop it into China’s first FTP by 2025. In June, Shenzhen’s municipal government also announced it would develop Shenzhen Port into an FTP by the end of 2020 “by further cutting red tape and streamlining customs clearance procedures.” As other cities race to deliver the first FTP, the establishment of an FTP has disappeared from Shanghai’s official development plan. At this time, Shanghai’s intentions in this regard are not clear.

While AmCham Shanghai fully supports the central government in introducing deeper and more substantial reforms nationwide, we also note that the establishment of an FTP that includes substantial reforms would be beneficial to the large number of American companies that are based in Shanghai and move their products through Shanghai’s ports. In addition, such an initiative would help the city meet its goal of establishing “centers of trade, finance economy and shipping” by 2020.

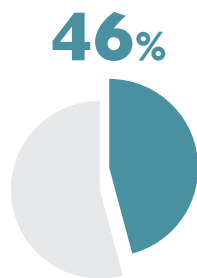
C. Nationwide Customs Clearance Integration Regime

Piloted in June 2016, and officially taking effect nationwide on July 1, 2017, the Nationwide Customs Clearance Integration Regime is one of the most important trade facilitation reforms of recent years. It aims to integrate and standardize the practices of Customs offices throughout the country. The reform established Risk Prevention Centers and Tax Collection Centers across the country to manage the entry of all imported goods as well as verify the accuracy of tax filings for goods imported through all Chinese ports. There are three of each type of center (six total nationwide). These offices are responsible for managing how goods are inspected and taxed throughout the country and are supposed to ensure that policies are uniformly implemented. According to the survey results, the reform appears to have had some impact with 46% reporting that they have “somehow benefited from the reform” and 40% of respondents stating they “have seen significant improvement in clearance efficiency.” This number should increase as the program becomes more established.

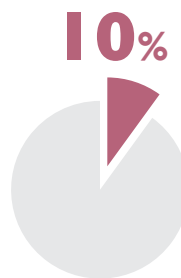
How would you describe the impact on your company from implementation of the “Nation-wide Customs Clearance Integration Reform” in the past year?



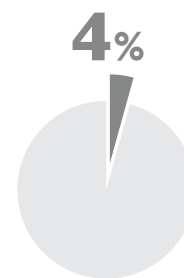
Have seen significant improvement (e.g. clearance efficiency)



Somehow benefited from the reform



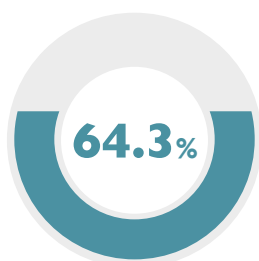
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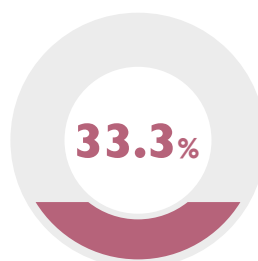
Negatively impacted by the reform

D. Customs/CIQ Merger

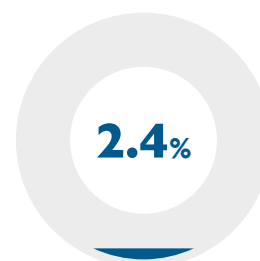
Under the government restructuring, AQSIQ's responsibilities in entry/exit inspection, quarantine, and labeling standardization were consolidated into the Customs (GAC). What is your expectation in this new scenario?



Reduced clearance
time/cost



Regulatory uncertainty
during the shift



No impact

During the National People's Congress meeting in March 2018, the central government approved plans to restructure and merge several agencies. In April 2018, the Chinese government announced that China's Administration of Quality Supervision, Inspection and Quarantine (AQSIQ)'s entry-exit inspection and quarantine department, along with its responsibilities, were consolidated into the GACC. As a part of this reorganization, companies no longer need to obtain AQSIQ's Certificate of Inspection for Imported/Exported Goods and should see a more simplified process of declaration, inspection and clearance.

Respondents have high expectations for this reform. When asked whether it would lead to reduced clearance times/cost or regulatory uncertainty, most members (64%) chose the former. Some respondents provided concrete feedback on their expectations, saying that they looked forward to:

- A new integrated and standardized rating system to maintain consistency.
- More simplified and transparent (re)certification processes that take companies' previous CIQ ratings into account.
- More timely and transparent information on responsibility/function changes.

VI. Expectations and Recommendations

China's further fulfillment of the WTO's Trade Facilitation Agreement (TFA) and more tangible benefits from qualifying as an Advanced Certified Enterprise / AA enterprise were selected as the top two preferential policies. When China ratified WTO's TFA in 2015 it agreed to take measures to improve the trade facilitation environment including expedited clearances, more cross-department coordination and reduced fees. China has taken some positive steps to fulfill its commitment and further progress would greatly benefit companies. The FTZ again lagged behind other reforms. But some respondents (14.6%) ranked it as the reform they looked forward to the most in 2018, indicating some companies still see potential benefit from the FTZ.

Regarding new policies and regulations, how is your company looking forward the following items in 2018? Please rank them according to the level of importance.

31.7%



Further fulfillment of the Trade Facilitation Agreement (TFA)

31.7%



More tangible benefits from qualifying as an Advanced Certified Enterprise / AA enterprise

22%



The advanced ruling regime for tariff classification, the origin of goods and customs valuation issues (GACC No. 236)

14.6%



More simplified processes and qualifications criteria to participate in the Free Trade Zone and/or Free Trade Port program

Shanghai's 100 Measures:

The Shanghai government released further reforms to facilitate trade in early July as part of its "100 Measures" initiative. The new reforms include:

- Enabling qualified enterprises outside of the special Customs supervision zones to conduct bonded maintenance business.
- Exploring a new cross-border e-commerce pilot model.
- Going paperless in Customs and E-port registration process, Equipment Interchange Receipt (E/R), Ocean Bill of Lading (B/L) and other operations at ports, harbors and shipping companies.
- Introducing the function of "clearance + logistics" into the Shanghai international trade single-window system and visualizing the entire logistics process from arrival to departure.
- Simplifying the import procedures for samples, equipment and reagents for qualified foreign R&D centers and improving the efficiency of the medical device clearance process.

These reforms reflect the Shanghai government's efforts to continue to facilitate trade. This is a positive message and one we welcome. We note that 90% of the measures are supposed to be implemented by the end of 2018.

Recommendations for Shanghai Customs and the Central Government:

AmCham Shanghai values its longstanding cooperation with Shanghai Customs and CIQ, and their continued efforts to improve the trade facilitation environment. The past year witnessed the merger of Customs and CIQ and a series of new Customs policies, which should lead to a more efficient clearance process. In this spirit, we offer the following recommendations to help these agencies meet their reform goals:

1. **For Shanghai Customs:** Introduce additional integrated Customs and CIQ enforcement measures beyond single-window declarations, in light of the recent merger of CIQ into Customs and the implementation of GACC 2018 Circular 60 and 61 on Customs declarations changes.
2. Fully implement Shanghai's "100 Measures" reform initiative, including all measures that touch on trade facilitation issues. We applaud Shanghai for issuing such an ambitious plan to improve the business climate. These measures will help improve the business environment and bring Shanghai closer to meeting its goals of building "international economic, financial, trade, shipping and scientific centers by 2020."
3. Meet more regularly with companies. Given the increased level of uncertainty in the past few months, companies are eager for more information and guidance from Customs. More interaction through briefings and dialogues would help Customs execute its responsibilities and encourage companies to make more use of Shanghai as a trading center.
4. **For the central government:** Introduce more reforms in the Shanghai FTZ and examine the possibility of establishing a Shanghai FTP. Although the Shanghai FTZ ranked lower than other reform initiatives in terms of its current tangible impact, it did play an important role in introducing reforms like the single-window system and the negative list. Shanghai should again use the FTZ to experiment with more reforms. In particular, our member companies are supportive of establishing an FTP in Shanghai. Many companies view Shanghai as an important logistics hub and would benefit substantially from an FTP.

Recommendations for AmCham Shanghai Member Companies:

1. Actively engage with Customs to gain a better understanding of Customs' priorities and policies. This is particularly important because Customs has shifted its approach to supervision. Rather than rely on universal inspections, they have moved to spot checks and are relying on companies to self-monitor and implement self-compliance programs.
2. Upgrade your Customs Enterprise Rating to enjoy better Customs services. As Customs is taking a more risk analysis based approach, companies with higher levels of Customs enterprise classification will enjoy better services and faster clearance times.

I. 摘要

感谢您阅读《上海美国商会2018年贸易环境满意度调查报告》。本报告的撰写建立于今年6月初开展的《上海美国商会2018年贸易环境满意度调查问卷》的基础上——共计收到了70家会员企业的反馈，是上海美国商会与上海海关和上海中国检验检疫局（CIQ）沟通交流的重要部分。自2007年起，上海美国商会便与上海海关正式搭建了沟通交流的平台。并在2012年时，邀请上海CIQ加入了对话机制。作为上海美国商会贸易便利化工作组（TFT）的年度报告，本报告会就如何提高贸易环境便利度提供来自会员企业的反馈和建议。在本报告受到上海海关与CIQ重视的同时，亦期能为各会员企业提供参考。

今年的调查结果显示，上海海关和CIQ在降低企业通关成本以及缩短通关时间方面有明显提高；但同时，据在沪经营的美资企业反应，政策透明度及部门协作方面仍有进步的空间。面对一系列改革和利好政策时，受访企业代表指出，单一窗口使企业受益良多；但上海自由贸易区内的优惠政策未获得企业如此青睐。受访企业表示，2018年内他们最期待的两大政策是作为高级认证企业或AA级企业能获得更多的优惠待遇以及深化世贸组织的《贸易便利化协定》¹。

今年的调查问卷开展正值党和国家机构改革方案的一部分——“关检合并”的落实。2018年3月，党的十九届三中全会通过了《深化党和国家机构改革方案》，将国家质量监督检验检疫总局（AQSIQ）的出入境检验检疫管理职责和队伍划入海关总署。企业普遍期望由此能带来单据整合、分类流程简化及清关时间缩短等便利。据调查结果显示，对于新的海关企业信用管理办法——合并后引入的首批措施之一，目前仅38%的受访企业表示获得了充分的信息。随着关检合并的逐步推进，在预期这会带来一系列通关流程和法规变化的同时，企业也普遍对政策透明度提升有所期待。在过去的一年中，美中两国间的经贸摩擦亦给双方之间的贸易环境带来了种种的不确定性。目前两国政府已开展了关税较量，并分别由两国的海关部门执行。

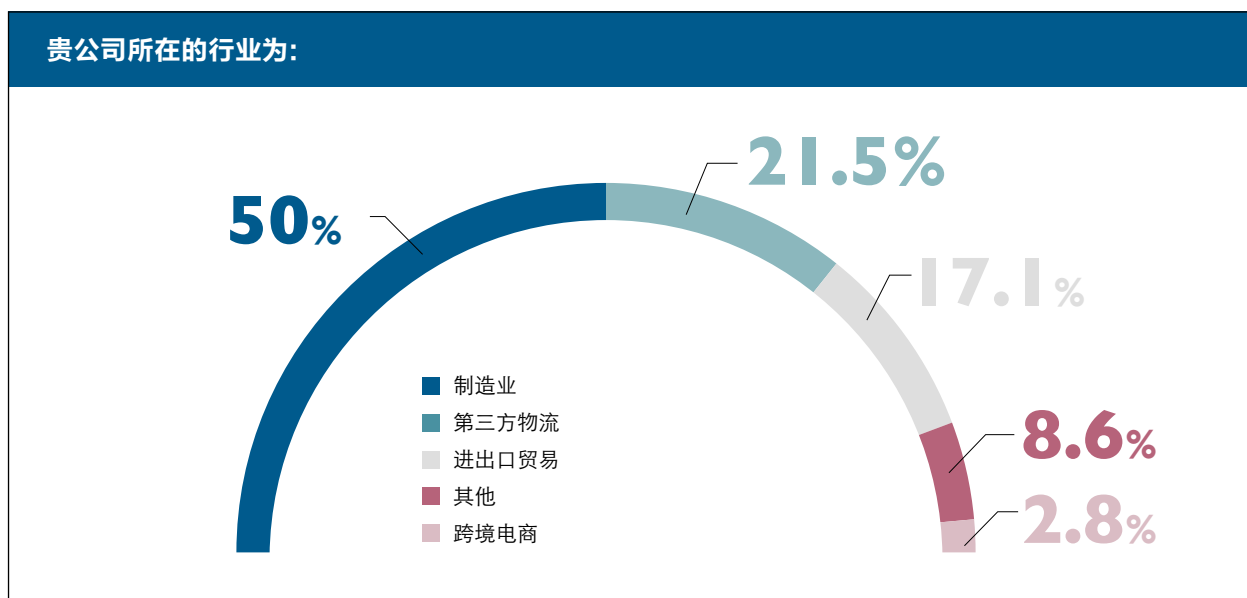
在此背景下，上海美国商会以及会员企业对于上海海关对于上海海关大力普及政策，以及与业界的积极交流十分欣喜。为协助进一步改善贸易便利化环境，上海美国商会促请上海海关在“关检合并”以及2018年海关总署第60和60号公告关于海关申报变更的背景下，引入更多除单一窗口外的关检融合执法措施，进一步提升通关效率。同时，全面实施上海“扩大开放100条”倡议中贸易便利化方面的改革，并加强与企业的沟通交流，如：工作会、政策宣讲等形式，提升政策透明度并及时了解企业的问题与诉求。同时，我们也希望中央政府可以考虑在上海自贸区引入更多实质的改革和优惠政策，并探索建立上海自由贸易港的可能性。

同时，我们建议会员企业加强与海关部门的沟通交流，更好地了解相关政策与实际操作指导；以及，进一步提高海关企业信用等级，以享受更多的通关便利优惠措施。

¹ 2015年9月，中国正式接受世界贸易组织（WTO）的《贸易便利化协定》。其规定了各成员在贸易便利化方面的实质性义务（涉及信息公布、预裁定、货物放行与结关、海关合作等内容），旨在改善贸易便利化环境、加速货物的放行和流动、提高贸易效率、降低贸易成本。

II. 受访企业情况

《2018年上海美国商会贸易便利化调查问卷》开展于今年的六月，共计收到了70家会员企业的反馈。大部分受访企业来自于制造业（50%），其次是第三方物流（21.5%）和进出口贸易行业（17.1%）。以年度营收为标准来看，大部分（64.3%）受访企业为超大型规模企业（1亿美元以上），其次（21.4%）是中型企业（1000万美元–5000万美元）。

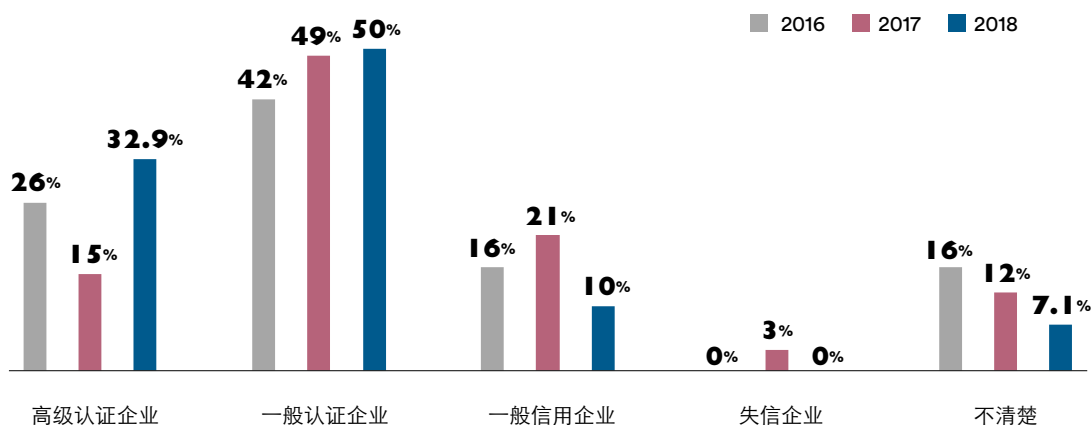


企业信用评级：意识提升

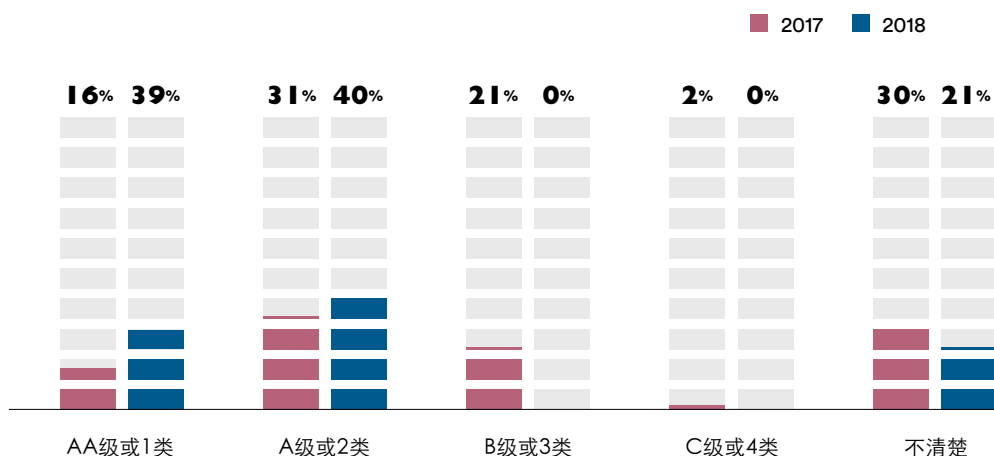
今年四月，作为党和国家机构改革方案的一部分，原中国出入境检验检疫部门正式并入中国海关，由此带来一系列通关新变化。同时，令人欣喜的是，过去的一年中（2017–2018），会员企业对海关和CIQ的企业评级系统的了解与信用等级水平都大幅提升。尽管受访者中，占比最大的企业群体仍是海关一般认证企业（50%）和出入境检验检疫（CIQ）信用管理A级（40%），但获评海关高级认证企业和CIQ AA级的受访企业比例较去年明显增加——分别由15%和16%提高至今年的32.9%和39%。

除此之外，表示不清楚企业自身的海关和CIQ信用评级的受访企业比例也分别从去年的12%和30%降至今年的7.1%和21%。了解并提升企业的海关和CIQ评级有助于降低通关风险并增强企业与相关政府部门的积极联系。更重要的是，评级较高的企业可以享受一系列组合激励措施，获得更优的便利措施，以此实现通关效益最大化。令人鼓舞的是，会员企业已经采纳了去年报告中的此项建议，逐步了解并提升了他们的企业信用评级。

海关企业信用评级：



CIQ企业信用评级

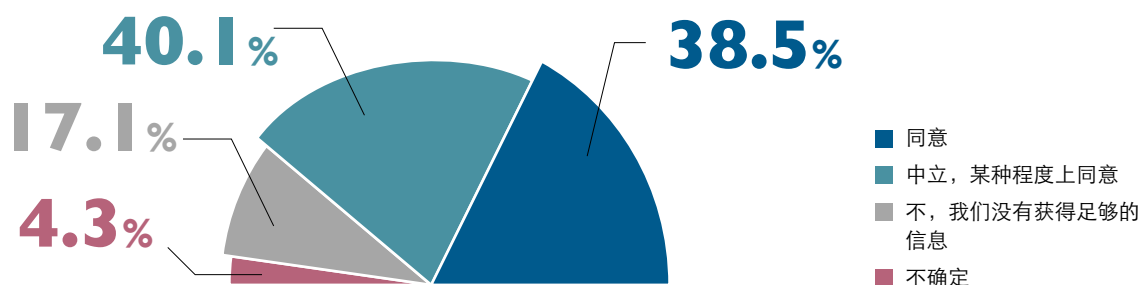


海关认证经营者（AEO）

2014年，中国海关正式将世界海关组织（WCO）授权的经济运营商（AEO）分类系统纳入法制化轨道。在此框架下，被认定为AEO（认证经营者）的企业（目前，只有AEO高级认证企业可获得互认），包括高级认证企业和一般信用企业，可以从33个（截至2017年12月）国家/地区享受相互认和海关优惠便利措施（如：查验率较低、优先通关和单证简化）；其中包括28个欧盟成员国，新加坡，韩国，香港特别行政区和瑞士。目前，中国也在积极寻求与美国、日本、马来西亚及其他一带一路沿线国家的AEO互认协议。

AEO企业可以享受优惠的海关待遇，如：优先查验和办理通关手续，指定的企业协调员（专门负责协调海关与企业涉及进出口业务相关事宜的海关工作人员），以及除海关外多部委的联合激励与惩戒措施。上海美国商会鼓励会员企业申请AEO认证企业资质，进一步提高通关效率、降低通关隐性成本。

在企业海关信用评级重新认证或相关事宜上，贵司是否获得了来自海关部门充分的意见或指导？



2018年3月，海关总署发布了新的《中华人民共和国海关企业信用管理办法》（第237号令，于2018年5月1日正式施行），2014年海关总署令第225号公布的《海关企业信用管理暂行办法》同时废止。新措施在信用管理方面做出了重大调整，比如要求企业“在信用信息管理系统内向海关提交《企业信用信息年度报告》”，以及一系列差别化明显的管理措施，增加企业申请高级认证的红利。新措施还在原有的基础上与世界海关组织倡导的AEO制度持续推进。

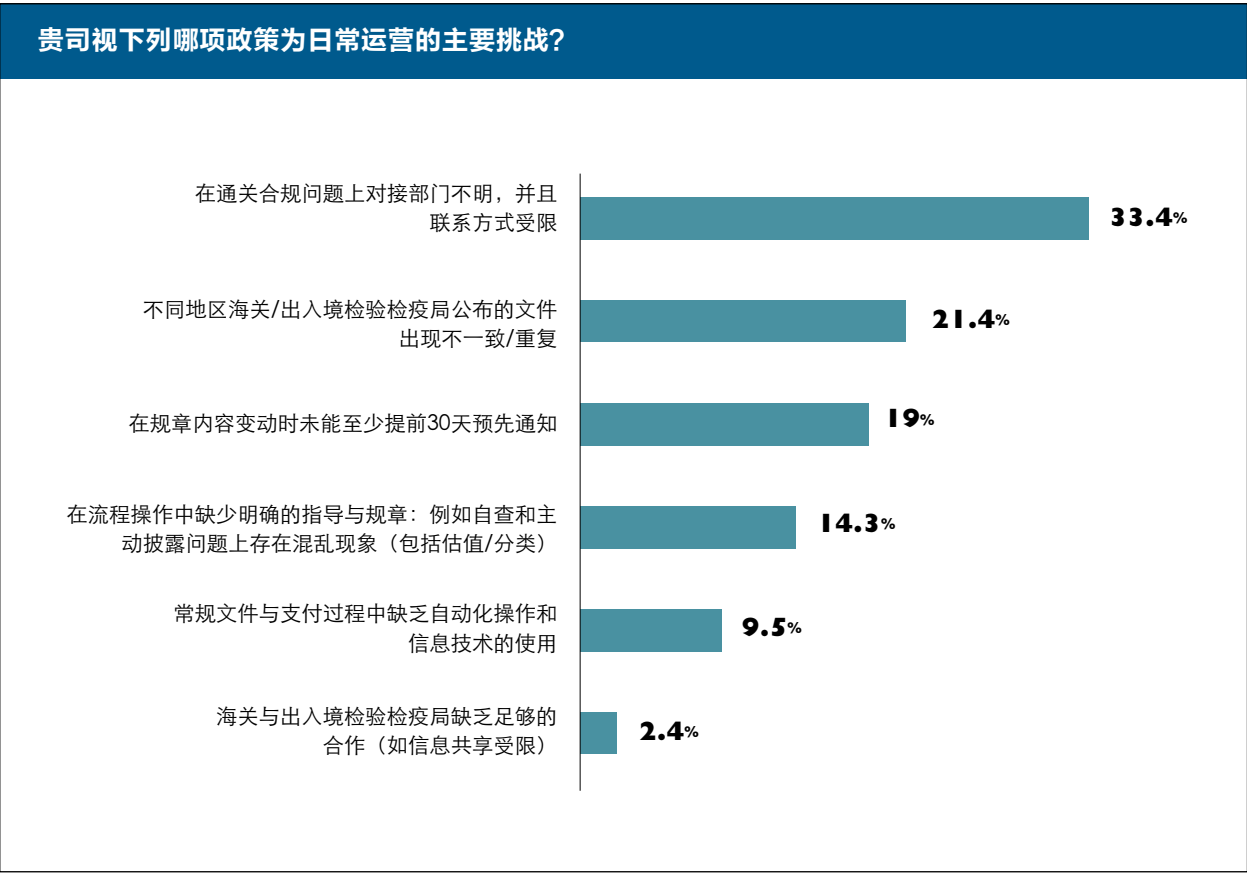
相较于之前的暂行办法，新规定明确并量化了对于不同信用等级企业的管理措施尺度。比如，对于在暂行办法中所称“更高”、“减少”和“简化”等形容，新措施明确表示“高级认证企业的平均进出口货物查验率（下称“查验率”）在一般信用企业平均查验率的20%以下；一般认证企业的平均查验率在一般信用企业平均查验率的50%以下。同时，失信企业将面临80%以上的平均检查率。”

此项改革旨在通过向高信用企业提供优惠待遇（如：高级认证企业可向海关申请免于提交担保的资格）以及对失信企业加大惩罚力度（如：将失信企业调整为一般信用企业的时间期限由原来的1年延长至2年，增加失信企业信用修复的时间成本），来鼓励企业提高企业认证级别。此外，新规定还引入了联合监管体系，与国家其他有关部门实施守信联合激励和失信联合惩戒。

但当被问及“是否已获得关于新的信用管理制度的充分信息与指导”时，仅38%的受访企业表示同意；40%左右的受访企业表示中立；17%的公司表示他们未获得足够的信息。虽然，上海海关部门长期以来积极推动政策透明度的努力有目共睹，但此新政的透明度仍有提高的空间。

III. 挑战：政策透明度与部门协作

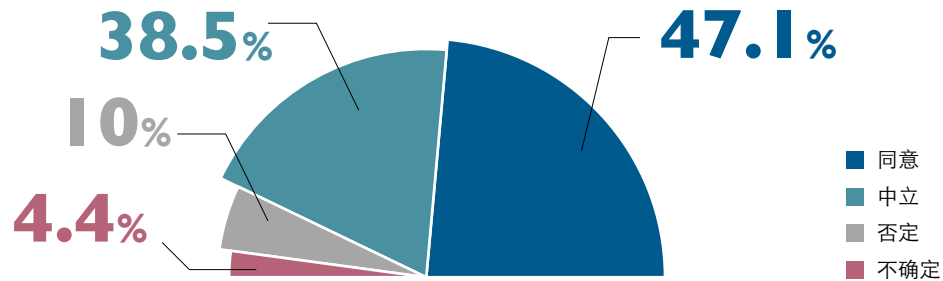
在贸易推进考虑因素方面，会员企业认为“在通关合规问题上对接部门不明，并且联系方式受限”是他们日常业务中面临的主要挑战。位列其次的有：“不同地区海关/出入境检验检疫局公布的文件可能出现不一致/重复”，以及“在规章内容变动时未预先足够的准备时间（如：30天）”。多年来，这是我们的调查问卷首次问及运营挑战，这几项也是会员企业长期以来期待改善的领域。但我们相信，随着“关检融合”的推进，上述领域一定会出现进一步的改善。



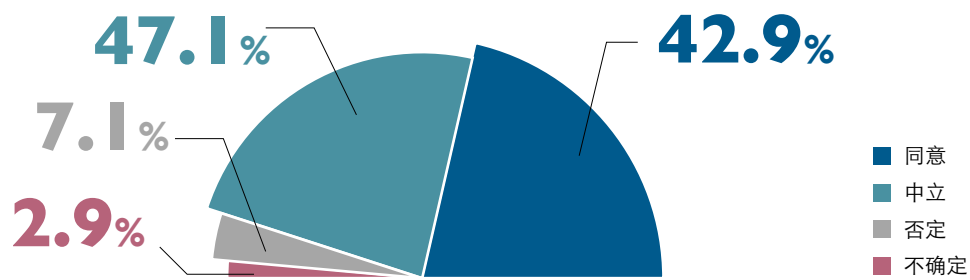
A. 政策透明度

令人欣喜的是，今年分别有47.1%和42.9%的受访企业认同“较前一年相比，上海海关与上海CIQ在处理企业的日常事务时，更加透明、高效和可预测”。但同时，仅一半（50%）的受访企业认为他们能够通过上海海关和CIQ的网站以及公开的信息平台获取足够的信息（如：相关法律法规和行政裁定），较去年同比（70%）有所下滑。会员企业希望可以通过这类信息平台获得“政策的及时更新”、“详细的操作指导”以及“更多关于非关税要求的指导”。随着“关检融合”的推进，会员企业希望海关部门可以持续提升政策与信息透明度。

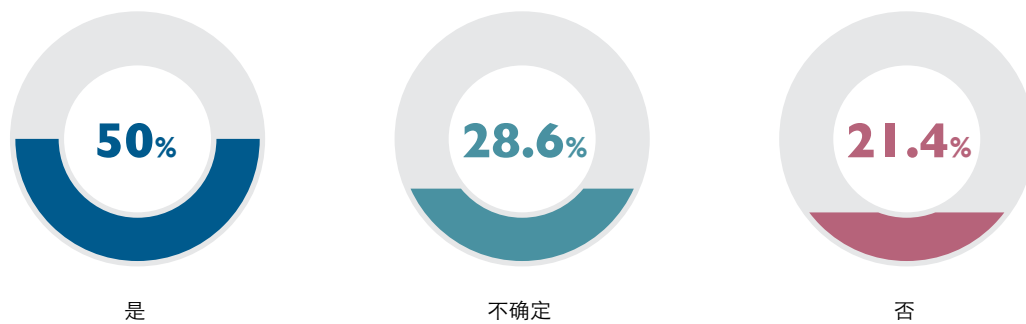
与前一年相比，您是否同意您与上海海关的常规交涉是否变得更透明、高效、可预测性



与前一年相比，您认为您与上海出入境检验检疫局的常规交涉是否变得更为透明、高效和可预测？

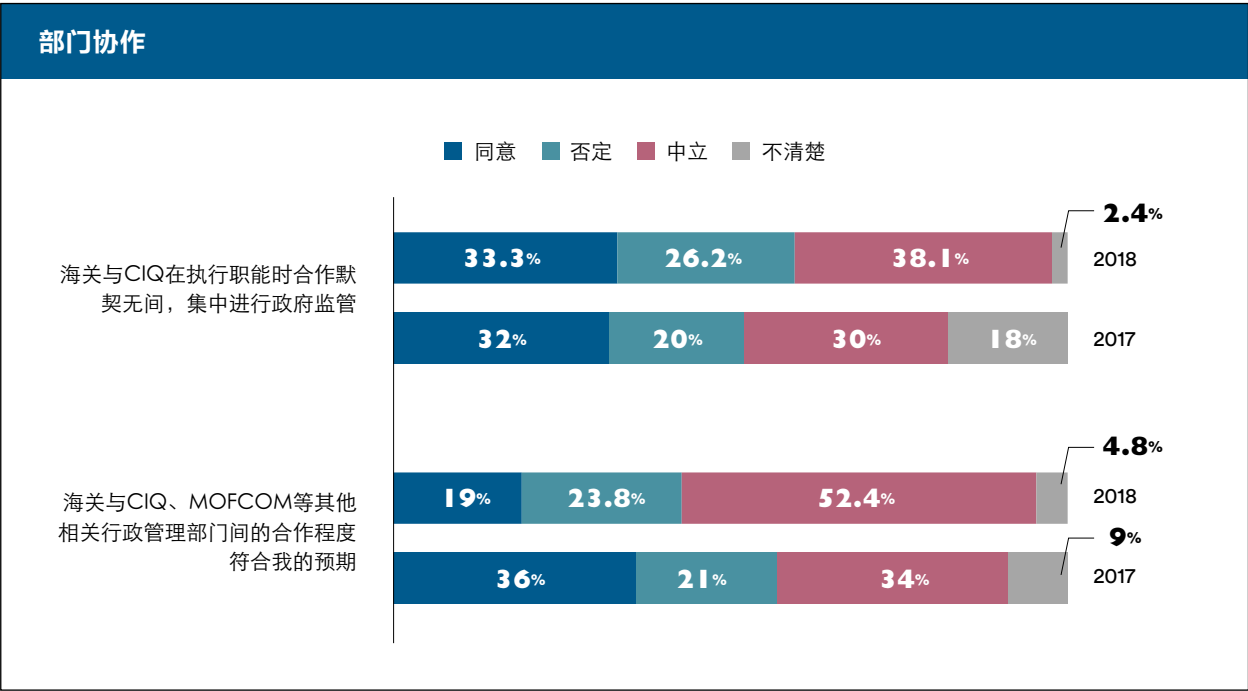


贵公司是否能够从海关的网站或是其他信息公开平台获取足够的信息（例如申请程序）？



B. 部门协作

与往年相似的是，业界仍然对“海关加强与不同地区海关间协作”持很高的呼声。仅31%的受访企业认为“中国各地的海关机构之间配合和沟通度高”，36%的受访企业表示“海关与其他相关行政管理部门间的合作水平符合预期”，33%认同“各部门间所要求的标准文件合理、无重复”。值得注意的是，认为“过去的一年中海关与CIQ协作默契，监管集中、统一”的受访企业比例较去年调查结果（36%）出现明显下降。不过，企业代表乐观地相信，该现象将由于“关检合并”得到改善，大部分（64.3%）受访企业相信此项改革将大幅提高效率，降低通关成本。

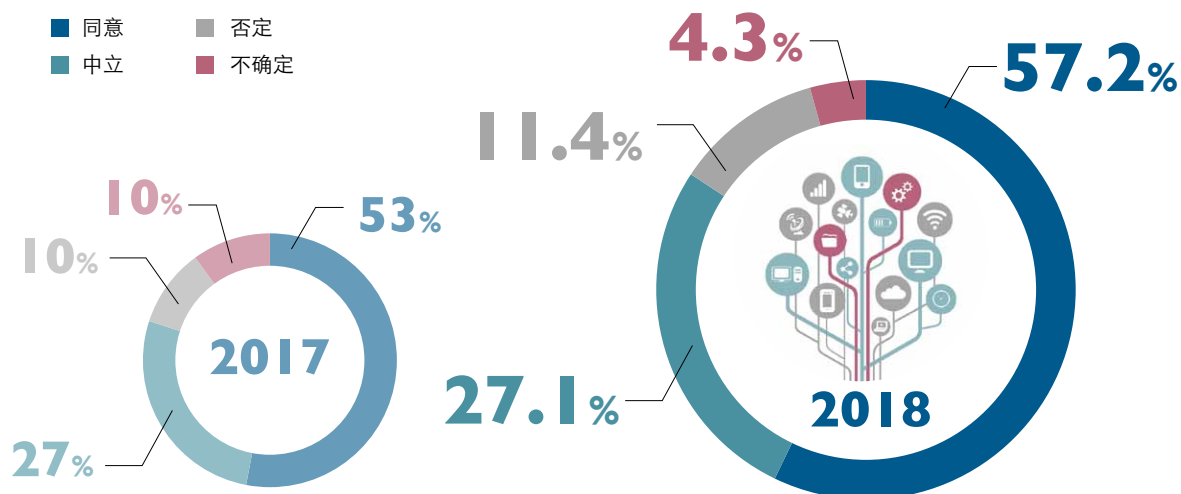


IV. 贸易推进考虑因素

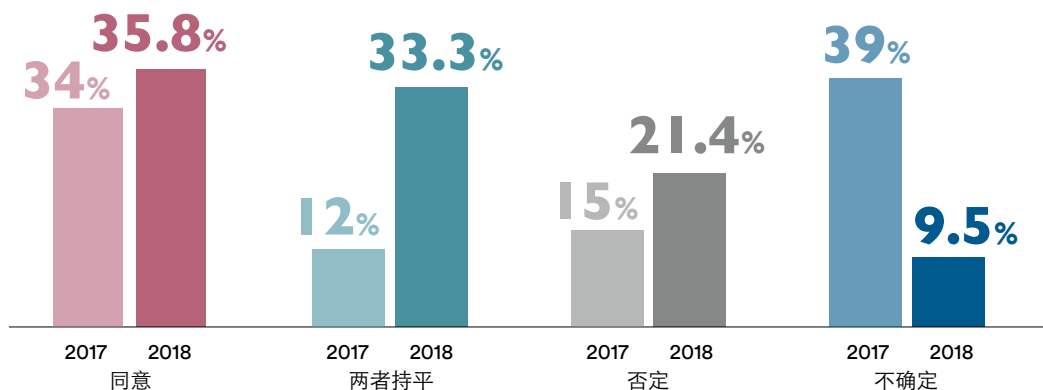
A.运营效率

与往年调查结果相比，更多的受访企业认同“海关部门对自动化与信息技术的使用程度有所提高”。多数（57.2%）受访企业表示“在公司的日常进出口交易（关税和其他费用）中采用了充足的自动化和信息技术”，高于去年同比（53%）。同时，认同“在上海，由于清关时间的不确定性（例如持有多余库存，资本附加费用和针对交易的查验）而消耗的成本比在全国其他地方都要少”的受访企业比例（35.8%）也有所增长（去年同比34%）。但持相反感受的企业比例（21.4%）亦有所增加（去年同比15%）。导致该现象的一个可能原因是海关总署全面实施全国通关一体化，实现全国各地海关统一执法标准（详见章节V.（C））。

您是否同意以下说法：自动化操作与信息科技已经在贵公司的常规进出口交易中得到充分利用（关税及其他费用）？



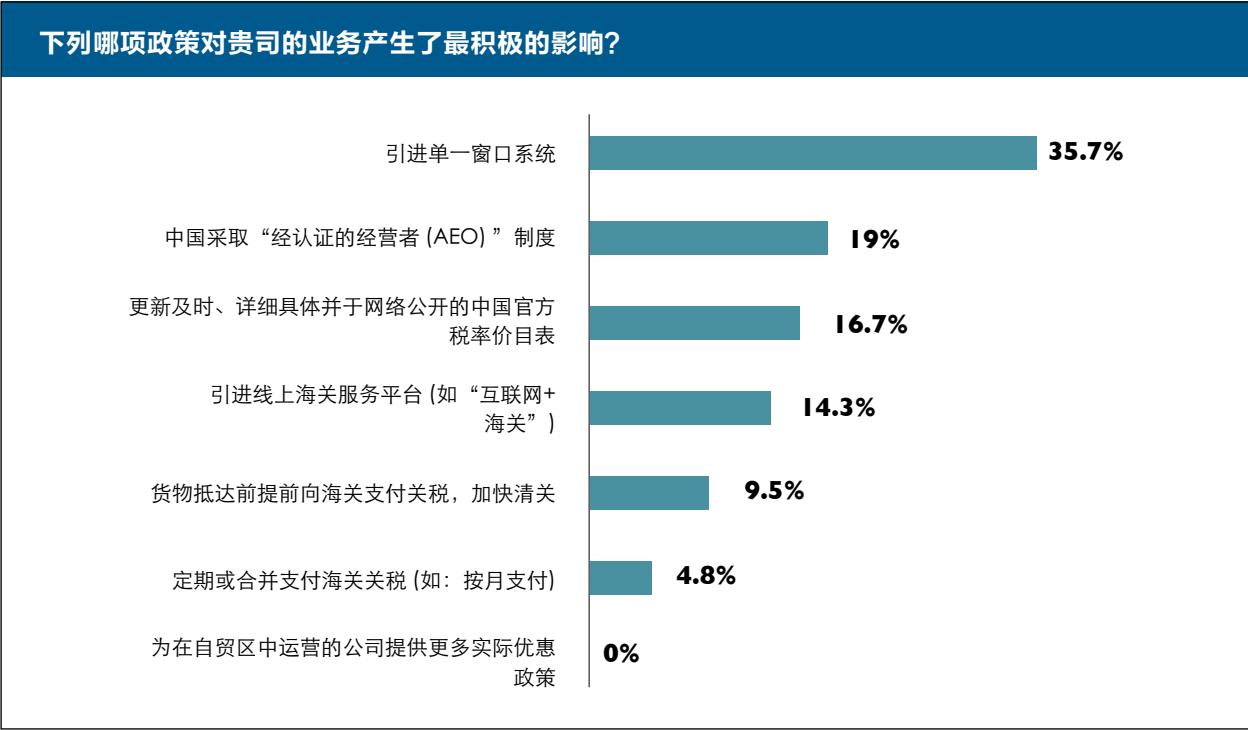
您是否同意贵司在上海地区因通关时间的不确定性（例如持有存货、资本的附加费用和针对交易的检查）而负担的成本与中国其他地区相比更低？



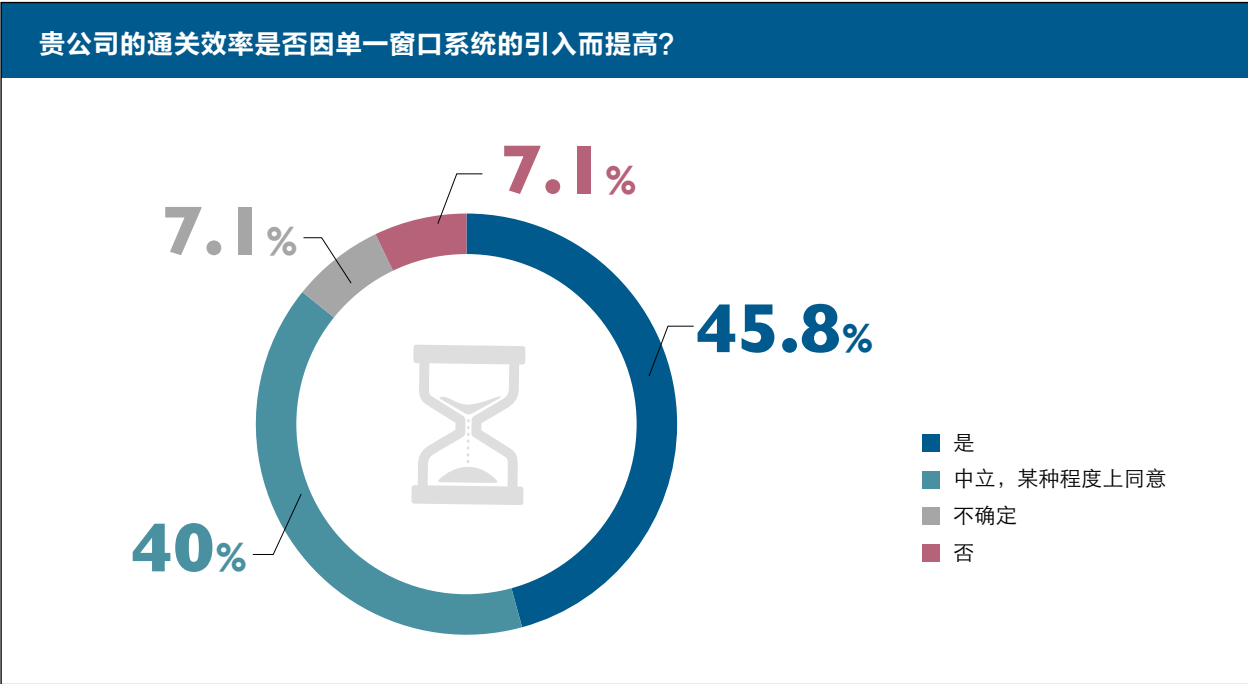
V. 改革与新政

在过去的几年中，海关总署和上海海关引入了许多改革措施，致力于改善全国各地区的贸易便利化环境。一些改革政策（如：国际贸易单一窗口），为企业带来了十分积极的改变；但同时，调查结果显示，往年呼声很高的自贸区改革政策在今年受欢迎程度有所下滑。

当被问及哪些改革或新政对企业的日常业务最有帮助时，35.7%的受访企业提到了国际单一窗口的引进，其次为“中国海关实施AEO制度”（19%），“及时在线更新中国官方税率价目表”紧随其后（16.7%）；但“为在自贸区内运营的企业提供的优惠政策”未获投票。



A.国际贸易单一窗口



在过去几年海关引入的重大改革中，国际贸易单一窗口的支持呼声最高（35.7%）。单一窗口系统于2014年首次在上海试点，2017年11月在全国范围内实施。为了提高通关效率并降低成本，该系统使企业可以通过在线平台一次性申报货物及税收。在这一新系统下，公司不再需要同时向海关、入境检验检疫局、中国海事局等11个不同部门提交重复的贸易文件；同时，所有上述部门都可以获取并共享公司的申报数据、物流信息以及企业信用状态。这一改革是政府提供跨部门协调、标准化服务的又一体现。

B. 上海自贸区

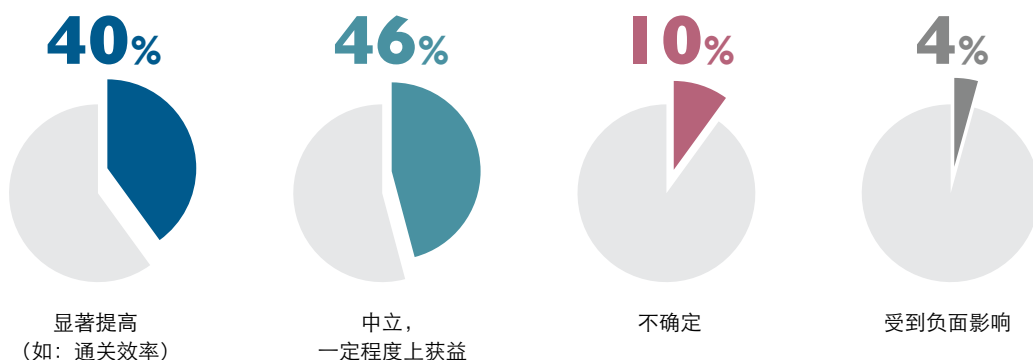
近年来，上海在改革创新领域持续发力，但从企业普遍感受来看，自贸区带来的便利政策似较往年受到的积极反响似乎有所下降。今年的调查中，未有受访企业将“为在自贸区中运营的公司提供更多实际优惠政策”作为对企业最有帮助的改革。上海自贸区成立于2013年，是中国内地第一个自贸区，长期以来不负业界对“改革试验田”的众望，探索并引入了一系列改革措施，如：减少关税和简化清关流程，国际贸易单一窗口、自由贸易账户和负面清单投资管理制度。不仅如此，更提供了很多可复制、可推广的宝贵经验，为在自贸区内经营的企业都带来了利好。

2017年底，上海曾经透露“正按中央部署筹划建立自由贸易港”。作为自贸区的升级形式，自贸港是一个“离岸地区”，预计在贸易、投资、融资和航运/运输方面将给予更多自由。但与自贸区相比，自贸港在资本管制、免费关税和最少清关程序方面会更加宽松。但今年4月，海南宣布建设自由贸易试验区并“逐步探索中国特色自由贸易港”。随后在6月，深圳市政府也宣布将于2020年底初步建立自由贸易港，“取消或最大程度简化港区货物的贸易管制措施”，但上海建立自由贸易港的计划却未有后续。

上海美国商会全力支持中央政府在全国范围内进行更深入、实质性的改革，但同时我们也促请政府考虑在上海建立自贸港的可能性——这一倡议也有助于上海实现2020年成为“贸易、金融、经济和航运中心”的目标。上海已具有充分的基础建设自由贸易港，比如一些外资企业已在上海和长三角地区建有相关配套设施，并且，自贸港将会为在沪经营的企业带来非常积极的影响。

C. 全国通关一体化改革

您认为“全国海关通关一体化改革”对于贵公司的业务实践有何影响？



2016年6月，全国通关一体化改革率先在上海启动试点，并于2017年7月1日在全国范围内正式生效，并成为近年来最主要的贸易便利化改革之一，旨在整合全国海关监管资源的协同监管制度。改革在全国范围内建立了三个风险防控中心和三个税收征管中心，以管理所有进口货物的入境，并核实所有在中国港口入境的进口货物其税务申报的申报的信息准确。每种类型的中心各有三家（全国共六家），负责管理全国各地的货物检验和税收方式，并确保政策实施的一致性。调查结果显示了会员企业对改革的积极反馈：40%的受访企业表示清关效率显著提高，46%的受访企业表示“在一些方面受益”，我们相信，这一比例会随着改革的推进持续增加。

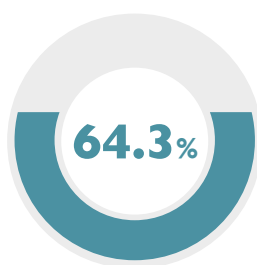
D. “关检合并”

在2018年3月全国人民代表大会期间，中央政府批准了重组和合并若干政府机构的计划。2018年4月，中国质量监督检验检疫总局的出入境检验检疫部门及其相关职责正式纳入海关总署。合并后，企业不再需要填写《出/入境货物通关单》，通过新整合的申报系统实现更简化的申报、检查和清关流程。

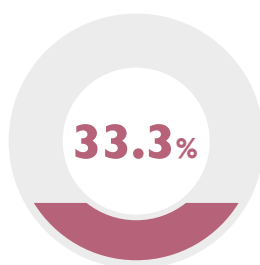
受访企业对关检合并有很高的期望。大部分会员企业（64%）认为该项改革会大幅改善清关时间和成本，改善营商环境。具体的企业反馈包括：

- 标准统一、一致的综合企业信用评级体系。
- 更简化、透明的重新认证流程，并将企业之前的CIQ信用评级纳入考量。
- 对部门责任/职能的变化及时更新，与业界分享。

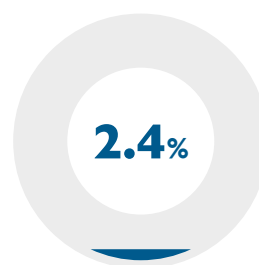
根据国务院机构改革方案，国家质量监督检验检疫总局将与其他机构整合，组建新的国家市场监督管理总局。同时，其出入境检验检疫职责被划入海关总署。您预期这一改革将：



降低清关成本，
节约时间



带来管理的
不确定性



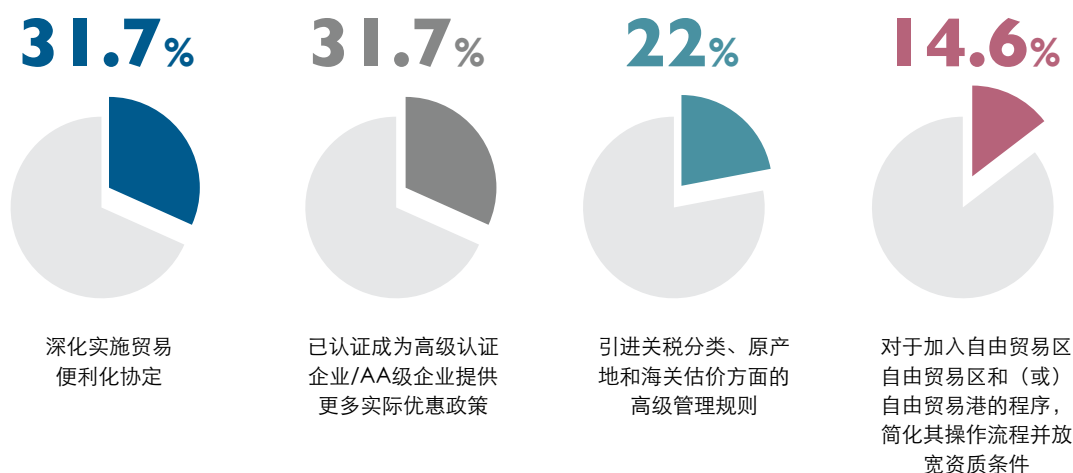
没有影响

VI. 展望与建议

新政

调查结果显示，“中国深化实施贸易便利化协定”和“为高级认证企业提供更多实际优惠政策”成为了受访企业最期待的两项优惠政策。虽然，自贸区内的改革政策稍有落后，但仍有一些（14.6%）受访企业将其列为2018年最期待的改革之一，表明一些公司仍然看到了自贸区改革的潜力。

贵公司在2018年对以下各项新政策和规章的期待程度如何？请按照重要程度对以下各项排序：



“上海扩大开放100条”：

上海市政府于7月初开始深入推进贸易便利化领域的一系列改革，作为《上海市贯彻落实国家进一步扩大开放重大举措加快建立开放型经济新体制行动方案》（“扩大开放100条”）的一部分。新改革包括：

- 在海关特殊监管区域内开展保税维修业务的基础上，进一步支持有条件的海关特殊监管区域外企业开展高附加值、高技术含量、无污染产品的保税维修业务。
- 争取开展跨境电商“网购保税+线下自提”新模式试点。
- 全面实施集装箱设备交接单无纸化，加快实施海运提货单无纸化，推动实现码头、港务、航运企业等口岸营运主体作业无纸化和电子化；并推行海关企业注册及电子口岸入网全程无纸化。
- 在上海国际贸易“单一窗口”增加“通关+物流”功能，实现从抵港到提离的全程可视化。
- 简化具备条件的外资研发中心研发用样本样品、设备、试剂等进口手续；对具备条件的生物医药服务外包企业研发用药物、医疗器械样品进口，通关时限缩短至15日。

上述改革均体现了上海市政府为改善贸易便利化环境的持续努力，90%的措施预计将于今年年底前实施。

展望

上海美国商会十分重视与上海海关的合作关系，并希望助力上海海关及政府持续改善贸易便利化环境。我们乐观地相信，过去一年内“关检合并”以及一系列其他改革政策将进一步提高企业通关效率，改善企业营商环境。上海美国商会向上海海关、中央政府、及会员企业，提出以下建议：

对上海海关的建议：

1. 在“关检合并”以及2018年海关总署第60和61号公告关于海关申报变更的背景下，引入更多除单一窗口外的关检融合执法措施，进一步提升通关效率。
2. 全面实施上海“扩大开放100条”（《上海市贯彻落实国家进一步扩大开放重大举措加快建立开放型经济新体制行动方案》）倡议中贸易便利化方面的改革。企业欣见上海此项扩大举措，并相信这将有助于助力上海于2020年成为“国际经济金融、贸易、航运和科学中心”的目标。
3. 加强与企业的沟通交流，如：工作会、政策宣讲等形式，提升政策透明度并及时了解企业的问题与诉求，并缓解对贸易紧张局势和监管不确定性的焦虑。

对中央政府的建议：

4. 在上海自贸区引入更多实质的改革和优惠政策，并探索建立上海自由贸易港的可能性。尽管本次调查结果显示，上海自贸区对企业产生的积极影响稍逊于其他改革举措，但它在引入单一窗口、和负面清单制度以及其他一系列改革方面发挥了重要作用。同时，企业十分支持在上海建立自由贸易港的倡议。上海作为许多外资企业在华的重要物流枢纽，若建成自贸港将为企业带来非常大的贸易便利。

对会员企业的建议：

1. 加强与海关部门的沟通交流，并密切关注海关部门相关网站和其他信息来源，及时了解海关的相关政策、优先事项与实际操作指导；建立更集中有效的内部审核与自我合规系统，适应新的海关核查制度。
2. 进一步提高海关企业信用等级，以享受更多的通关便利优惠措施。

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