



UNITED NATIONS
DEPARTMENT OF ECONOMIC AND SOCIAL AFFAIRS
STATISTICS DIVISION

**Meeting on compilation issues of IMTS 2010
Mexico City, 6-9 December 2011**

Report

(27 January 2012)

I. Organization, purpose and participants

The United Nations Statistical Commission at its forty-first session (23-26 February 2010) adopted “International merchandise trade statistics: concepts and definitions 2010” (IMTS 2010) and endorsed the proposed implementation programme, including the preparation of the revised *International Merchandise Trade Statistics Compilers Manual* (IMTS Compilers Manual).

The United Nations Statistics Division (UNSD) organized this meeting on compilation issues of *International Merchandise Trade Statistics, Concepts and Definitions, 2010* (IMTS 2010) from 6 to 9 December 2011 in Mexico City in cooperation with and hosted by the Instituto Nacional de Estadística y Geografía (INEGI) of Mexico.

Purpose. The purpose of the meeting was to review all draft chapters of the revised IMTS Compilers Manual, to gather country experiences and good practices in the IMTS data compilation for inclusion in the Manual and to overall assist UNSD in the finalization of the provisional draft of the updated/revised IMTS Compilers Manual in light of previous discussions and country feedback. Specifically, this meeting focused on making improvements to the draft chapters, providing additional information and filling gaps and giving overall guidance on how to improve the text and the Manual. The meeting also asked for concrete proposals for country examples at indicated places in the draft manual and asked experts to commit to provide the exact wording of those examples, or provide existing text which UNSD could summarize. The meeting discussed all aspects of quality assurance, data sources, data compilation and data dissemination of merchandise trade statistics. Further, this meeting was requested to take note and advice on the further implementation programme of UNSD regarding the revised recommendations for IMTS (IMTS 2010).

Background. At its first virtual meeting on the update of the IMTS Compilers Manual from 12 January to 28 February 2011 the Expert Group on International Merchandise Trade Statistics (EG-IMTS) agreed on the overall structure and contents of the individual chapters as reflected in the annotated draft outline. A worldwide consultation on the updated draft annotated outline resulting from this first virtual meeting took place between March and May 2011. The second virtual meeting discussed the first set of draft chapters (chapters 1, 2, 3, 5, 8, 9, 13, 16, 19 and 22) and the third meeting discussed the second set of draft chapters (chapters 4, 11, 12, 14, 17,

20, 21, 27 and 28).¹ These chapters were drafted by UNSD and were prepared with assistance and input of many members of the EG-IMTS. The updated drafts of the first and second set as well as initial drafts of the remaining nine chapters (chapters 6, 7, 10, 15, 18, 23, 24, 25 and 26) were combined into one single draft text, the first full draft of the revised IMTS Compilers Manual. This draft text was provided to participants of this meeting and the members of the EG-IMTS two weeks before this meeting on 21 November 2011.

Participation. The following 15 countries participated in the meeting and were represented by a staff member from the national statistical agency responsible for the overall IMTS compilation and dissemination: Brazil (two participants), Canada, China, Colombia, Costa Rica, Germany, Italy, Jamaica, Mexico (multiple participants), Morocco, Norway, Philippines, Uganda, Ukraine and United States. In the case of Mexico the following members of the Specialized Technical Committee on Foreign Trade Statistics of Mexico participated: INEGI, Banco de Mexico, Tax Administration Service of Mexico and Ministry of Economy, each with multiple participants. In addition, representatives of the Common Market for Eastern and Southern Africa (COMESA), the Statistical Office of the European Union (Eurostat), the Food and Agriculture Organization (FAO) and the World Customs Organization (WCO) attended and contributed to the meeting. UNSD was responsible for all substantive and, in cooperation with INEGI, for all administrative matters of the meeting.

II. Summary

Opening session: Dr. Eduardo Sojo, Director General of the Instituto Nacional de Estadística y Geografía (INEGI) of Mexico opened the seminar by welcoming the participants and stressing the importance of INEGI as an independent institute and of the coordination of key statistical fields such as foreign trade statistics through national committees and institutional arrangements. Then, Mr. Ronald Jansen, Chief of the Trade Statistics Branch of UNSD welcomed the participants on behalf of Paul Cheung, Director of the United Nations Statistics Division (UNSD).

Following the formal opening, UNSD explained the objectives and organization of the meeting. After the information on administrative matters the meeting adopted the agenda. INEGI gave a presentation on the work of the Specialized Technical Committee on Foreign Trade Statistics of Mexico. UNSD introduced its work on international trade statistics. This was followed by a UNSD presentation on the status of the updating process of the IMTS Compilers Manual and the next steps. Finally, the opening session was concluded with a presentation by UNSD introducing the updated/revised IMTS Compilers Manual.

Sessions 2 – 6: Detailed discussion of all chapters. All chapters 1 to 28 plus a new chapter on the compilation of customs procedure codes were discussed in detail, section by section. To each chapter UNSD provided a short introductory presentation on its contents and some specific issues.

¹ The reports of the virtual meetings and the worldwide consultation are available on the UNSD website at: <http://unstats.un.org/unsd/trade/EG-IMTS/EG-IMTS%20web%20announcement.htm>. These reports are part of the documentation of this meeting.

Session 7: Relationship between specific chapters and structure of the updated/revised IMTS Compilers Manual; Editorial and dissemination issues; Upgrade of UN Comtrade (in particular monthly data); IMTS 2010 implementation and the EG-IMTS work programme: Introductions and brief presentations by UNSD were followed by a discussion as required.

Closing session: Introduction and adoption of the general conclusions of the meeting; the meeting concluded with closing remarks by UNSD and INEGI.

III. Fourth virtual meeting of the EG-IMTS on the update of the IMTS Compilers Manual

The fourth virtual meeting of the Expert Group on International Merchandise Trade Statistics (EG-IMTS) on the update of the IMTS Compilers Manual started on 20 December 2011. It discussed the draft of this report of the meeting on compilation issues of IMTS 2010 and was expected to adopt this report. Further, the virtual meeting was expected to endorse the updated/revised IMTS Compilers Manual, subject to the comments and suggestions contained in this report of the meeting in Mexico City. This endorsement will be understood as an overall agreement with the drafting process and content of the updated/revised IMTS Compilers Manual, and as an agreement that UNSD will finalize the Compilers Manual and its individual elements and paragraphs. The first full draft of the updated/revised IMTS Compilers Manual which was discussed in this meeting on compilation issues of IMTS 2010 was provided to the members of the EG-IMTS on 21 November 2011.

Background. The EG-IMTS supports the United Nations Statistics Division (UNSD) in the update of the IMTS Compilers Manual. It has developed the chapter outline for the Manual during 2010 and at its first virtual meeting on the update of the IMTS Compilers Manual from 12 January to 28 February 2011 agreed on the contents of individual chapters as reflected in the annotated draft outline. Two further virtual meetings discussed the initial drafts of the first and second set of draft chapters for the updated/revised IMTS Compilers Manual (chapters 1, 2, 3, 4, 5, 8, 9, 11, 12, 13, 14, 16, 17, 19, 20, 21, 22, 27 and 28).

Participation. All participants of the meeting on compilation issues of IMTS 2010 in Mexico City and all members of the EG-IMTS were invited to participate in this fourth virtual meeting of the EG-IMTS.

IV. Findings and conclusions

The meeting:

General conclusions

1. overall agreed with the structure of the first full draft of the updated/revised IMTS Compilers Manual (IMTS Compilers Manual, Rev.1) and the contents of the individual chapters, in particular also the chapters 6, 7, 10, 15, 17b, 18, 23 plus 24, 25 and 26 that were discussed for the first time, subject to the comments and suggestions contained in this report, and hereby endorsed the draft of the updated/revised IMTS Compilers Manual that has been made available;
2. agreed to the following changes to the current structure of the updated/revised IMTS Compilers Manual:
 - a) to move information on other trade classifications from Chapter 13 “Classification” to a separate chapter after the current Chapter 26 “Dissemination”;
 - b) to add the suggested chapter on customs procedure codes (because of the importance of this new data field) and to place it after the current Chapter 17 “Mode of transport”;
 - c) to combine and integrate Chapters 23 “Other special cases (Goods acquired by all categories of travellers, Media, whether or not recorded, waste, fishing products, leased goods, returned goods)” and Chapters 24 “Overview of data compilation for national accounts and balance of payment purposes” as suggested (as the categories of goods to be covered in these chapters overlap);
 - d) Annexes: that annexes will follow the respective chapter; some information might be moved into the website and out of the printed Manual;
 - e) that UNSD will consider splitting up the large Chapter 9 “Data quality: assurance, measurement and reporting” but took note that no clearly preferable alternative has been identified so far;
3. took note of the further drafting process of the updated/revised Compilers Manual which includes
 - a) discussion of and agreement on this report and endorsement of the draft updated/revised IMTS Compilers Manual in the fourth virtual meeting of the Expert Group on International Merchandise Trade Statistics (EG-IMTS), subject to the comments and suggestions contained in this report;
 - b) provision of suggested input and examples by the participants of the meeting on compilation issues of IMTS 2010 preferable by 6 January 2012 (also purely textual inputs are welcome at this stage); inputs can be either sent to reister@un.org, with copy to vmarkhonko@gmail.com or posted on the EG-IMTS Expert Forum at <http://comtrade.un.org/ef/> under the sub-forum "*Post your input here! IMTS Compilers manual - All draft chapters*";
 - c) completion by end of January/ beginning of February of a second draft of the updated/revised Compilers Manual which will incorporate all comments, suggestions and inputs of meeting participants and which will be provided to the 43rd session of the

Statistical Commission (28. Feb. – 2 Mar. 2012) as a background document for information;

- d) finalization of the manuscript and submission to the UN editor by June/July 2012 (planned) with the edited (but not formatted for printing) version expected to become available end of 2012;
 - e) establishment of a website for the IMTS Compilers Manual by UNSD which will allow to provide additional or updated information and examples;
4. took note of the work programme of the EG-IMTS and activities for IMTS 2010 implementation, including the update of UN Comtrade;
5. welcomed the progress in UNSD's initiative of compiling and disseminating monthly merchandise trade data; discussed the issues of data revisions, data transmission, automated data upload and metadata concerning the monthly data;

Further conclusions concerning the draft text of the updated/revised IMTS Compilers Manual

6. took note that the revised IMTS Compilers Manual will contain further and more detailed explanation of certain recommendations in addition to providing practical guidance for compilers; the Manual will encourage compilers to follow the provided good practices and may recommend specific solutions; the Compilers Manual will not introduce any new recommendations or encouragements in comparison to IMTS 2010; IMTS 2010 sets the internationally agreed standard and the IMTS Compilers Manual gives additional guidance for their implementation and should be consistent with the recommendations and encouragements in IMTS 2010;
7. agreed to refer to such encouragements and recommendations in the Compilers Manual as indicated in the preceding paragraph with wording such as "it is good practice", "countries are advised to" or "countries could";
8. took note that each chapter should stand for itself which might result in some repetition of material and agreed with the proposal that the introduction of each chapter should discuss the relationship of this chapter with the other chapters in the Manual and clarify to users why it is needed as a separate chapter;
9. agreed to insert cross references to other chapters where appropriate;
10. country practices: took note that UNSD will standardize their presentation and either present them within the text, as text boxes or in annexes, as seen appropriate; took note that UNSD will try to keep all of them in the publication and will consider moving them to a IMTS Compilers Manual website only as the last option which should be avoided;
11. agreed that country practices should be only included if deemed useful to compilers; noted that some examples may represent a good, best or accepted practice in solving a specific issue; others might only illustrate the specific issue; further, took note that some compilation issues are complex and without clear answer;

12. indicated that a short introduction (preface) to the revised IMTS Compilers Manual needs to be drafted, stating the objectives and purpose of the Manual, informing about the drafting process and other background information, including the distinction between IMTS 2010 and the IMTS Compilers Manual;

Part 1. Legal framework and data sources

Chapter 1: Legal framework

13. Paragraph 1.1: suggested to re-phrase this paragraph, stating more clearly what institutions may be the key actors in compilation of trade statistics, so as to take into account those cases in which customs is producing the trade statistics and possibly additional data sets for other purposes;

14. Paragraph 1.1: noted that the language of the paragraph needs editing and may focus on the right division of responsibilities; therefore paragraph 1.1 may be re-phrased using paragraph 1.10 as a model;

15. Paragraph 1.3: suggested to remove all references to the Kyoto Convention and replace them with references to the Revised Kyoto Convention;

16. Paragraph 1.6: suggested that footnote 1 on page 5 be reformulated / amended, as its justification is not clear;

17. Paragraph 1.6: suggested changing “minimum reporting burden” to “additional reporting burden”, as customs data in Europe are considered very heavy in terms of response burden;

18. Paragraph 1.6: suggested to highlight not only the advantages but also the limitations of customs data (e.g., under-recording, frequent variability, data validation issues, etc.) which may compel the compiler to look, in some cases, for alternative sources;

19. suggested to include examples of mechanisms other than legal acts that regulate compilation of trade statistics, e.g., Memorandum of Understanding (MoUs) and service level agreements between agencies involved in the compilation process;

20. pointed out the need to make a distinction between quality assurance issues and usefulness of customs records, acknowledging that customs records may not have full coverage, and suggested to avoid referring to quality assurance issues in paragraph 1.6;

21. Paragraph 1.7: suggested replacing “international stage” with “international forum”;

22. suggested adding an independent section for legal acts regulating institutional arrangements, noting that cooperation is two-ways, e.g., with NSO working together with Customs to improve methodology;

23. Section E: Took note of the offer by Morocco to provide an example of its experience in the development of the legal framework governing trade statistics, to be included in section E;

Chapter 2: Customs declarations and related customs records

24. suggested to include in the introduction of Chapter 2 some information on the importance of the correct use of customs data for statistical purposes, as, for example, knowledge of customs procedures is essential for statisticians;
25. Paragraph 2.1: suggested to write “At most points of entry” instead of “At most ports of entry” and to replace “economic territory” with “customs territory” in the first sentence of this paragraph;
26. Paragraph 2.2: took note of the suggestion to re-draft the last three sentences of paragraph 2.2 to indicate that customs and statistics may need to cooperate to arrive to a common definition and understanding of specific customs procedures (i.e. the distinction between transit and re-exports) and to emphasize the distinction between customs definitions and statistical definitions and the fact that a transaction falling under certain customs procedure may be later re-classified for statistical purposes (China tentatively agreed to provide an example when the customs procedure for certain cases of transactions has to be corrected);
27. Section B: took note of WCO’s offer to provide editorial comments on Section B;
28. Paragraphs 2.10 and 2.11: suggested having parallel titles for paragraphs 2.10 and 2.11, making reference to “inclusions in” and “exclusions from” IMTS, respectively;
29. Box 2.2: while Box 2.2 contains the official definition of the “drawback” customs procedure, took note of Brazil’s suggestion to include clarification on its specific implementation in Brazil and requested Brazil to provide its definition and practices regarding this procedure;
30. Section C: suggested to add references to the relevant specific annexes of the Revised Kyoto Convention when presenting the various customs procedures (e.g., Drawback refers to specific annex E, etc.);
31. Box 2.3: suggested to include a reference to IMTS 2010 to clarify the meaning of “a specified period” for the definition of Temporary Admission and to verify the definition of transshipment;
32. suggested to link or cross reference (or potentially move) the information on customs procedures contained in Chapter 2 to the new chapter on customs procedure codes;
33. Paragraph 2.14: suggested to reformulate the last two sentences of paragraph 2.14, as current language is inaccurate, considering that in modern customs operations all shipments and declarations are subject to a risk assessment which allows to significantly limit physical inspections; in some countries information about inspections is flagged in the data while in other countries no such information is available;
34. Paragraph 2.14: took note of the suggestion by Uganda to incorporate a few sentences in paragraph 2.14 encouraging compilers to cooperate with customs to improve on inspection / verification (Uganda offered to provide some text);
35. Paragraph 2.15: took note of the suggestion by Eurostat to draft some text on the fact that the checking of accompanying information by the compiling agency would only occur in special cases due to the large amount of transactions and only if a clear link between declaration and accompanying information is established;
36. Paragraph 2.16: suggested to emphasize the need for close cooperation between customs and the compiling agency (via MoU) and questioned the phrase “when it arises”;

37. Paragraph 2.23: suggested to review the use of the term “procedure” in paragraph 2.23 and Box 2.5 and to maybe replace it with another word;
38. Paragraph 2.23: suggested to include the case of duty free shops, which however might be best included in Chapter 6;
39. Paragraph 2.27: took note of suggestion by the Philippines to include a reference to the need of compilers to engage in advocacy;
40. Paragraph 2.29: suggested to further clarify that this paragraph refers to keeping all customs records pertaining to imports and exports (not necessarily paper documents);
41. Paragraph 2.30: invited a contribution of COMESA, based on the material presented in a recent meeting in Lusaka;

Chapter 3: Non-customs data sources

42. Table 3.1: suggested to review the use of the concept of “transition countries” in table 3.1, and to include information on the date and source of the data as well as a reference on the relevant report;
43. Paragraphs 3.14 to 3.17: suggested to cover or provide a cross reference regarding the issue of data quality; suggested to clarify where in the Compilers Manual information on data exchanges between countries is included; suggested to use the term “non domestic customs data; suggested, keeping in mind that the issue shall not be confounded with estimation issues;
44. Section C: noted that mirror statistics as data source would fit in Section C;
45. Paragraph 3.21: suggested to indicate that ITRS might provide misleading partner information as it records the commercial (financial) flows and not the physical flow of goods;
46. Paragraph 3.22: suggested that the first sentence of paragraph 3.22 should be more general, not necessarily indicating the direction of the potential bias;
47. Paragraphs 3.26 to 3.27: noted that Section C.5 should in fact be Section D and that the information in paragraphs 3.26 and 3.27 should, most likely, be moved to Chapter 7; however in this case a cross reference would be provided in Chapter 3;
48. Paragraph 3.29: took note that the example of the United States for paragraph 3.29 has already been provided but that it will be re-sent;
49. Section C: invited meeting participants to provide examples of specific country policies on replacing customs value with statistical value;
50. Paragraph 3.10: noted that reference to Chapter 21 should be to Chapter 22;
51. Paragraph 3.11-3.13: suggested that "Fishing on High Sea" would be another important case and good example under section B.3;

Chapter 4: Enterprise surveys and other surveys

52. Section A: suggested to mention that concepts and definitions used in enterprise surveys should be the same or be harmonized with the ones used in IMTS; this could include the use of INCOTERMS in the case of the valuation of the transactions;
53. Section C: welcomed offers by Mexico and Ukraine to provide examples on their experiences regarding the organization of surveys; in this regard, Mexico suggested specifically mentioning the importance of institutional arrangements and inter-agency cooperation in relation to the design and implementation of surveys;
54. Paragraph 4.10: pointed out that small companies (informal sector) are not likely to engage in exports;
55. Paragraph 4.12: suggested to emphasize in paragraph 4.12 that one of the main methodological challenges is the estimation of product-level values in surveys due to their limited sample sizes;
56. Paragraph 4.13: invited Uganda to provide an example on surveys covering not only airlines and shipping companies but also other enterprises active at ports;
57. Section E: noted that Norway will provide an example but that the Norwegian survey of shipping companies does not include ships registered by Norwegian owners in foreign registries;
58. Section H: suggested to add a paragraph pointing out the possibility of using a survey to identify goods for processing;
59. Section H: welcomed offer by Morocco to provide an example of a survey to collect data on royalties paid in kind for the transportation of gas across its territory;
60. Section G: welcomed that Germany will provide an example of a survey to capture information on the trade transactions below certain thresholds;
61. took note that Mexico offered to provide an additional example on the use of administrative sources (in Chapter 3);

Part II Data compilation*Chapter 5: Institutional arrangements*

62. Paragraph 5.9: suggested to emphasize the limitations of Memorandum of Understanding (MoU's); the rules and operations of confidentiality need to be defined in order to deal with the risk of data disclosure;
63. Paragraph 5.9: suggested to include the experience of Italy, where the national statistical institute (NSO) signed a MoU with the statistical unit within the customs administrations, as the unit in charge of statistical production, but not with customs as a whole; the statistical unit in customs is not independent from the NSO in terms of methodology;
64. Paragraph 5.11 to 5.13: suggested that more information should be provided in the case when the NSO is the responsible agency;

65. Paragraph 5.13: emphasized the importance of this paragraph and noted that Memorandum of Understanding (MoU) are often too vague and that they should be as specific as possible; topics suggested to be included in this paragraph are timing of data supplies, cost sharing (if any), agreements on coding of variables, problem-solving mechanisms, contacts for each specific topic/issue, expected outcomes, activities to be undertaken by each party, as well as definition of a work programme with short-term and long-term objectives; noted Canada's offer to provide the table of contents of a current MoU;
66. Paragraphs 5.14 and 5.15: suggested to include an example of the data flow between various agencies;
67. Paragraph 5.15 – first sentence: suggested to write “increased need” instead of “increased pressure”;
68. Paragraph 5.16: suggested to add some text emphasizing that central banks might focus on the compilation of trade statistics according to BoP but that it is important to also properly publish data following IMTS;
69. Paragraph 5.17: suggested to move paragraph 5.17 to section E;
70. Section D: suggested to include an additional subsection addressing those cases in which other agencies are responsible for the compilation of trade statistics (e.g. Ministry of Trade);
71. Paragraph 5.23: suggested to add the “identification of data gaps” as an important element in paragraph 5.23;
72. Section E: welcomed the offer by Italy to provide an example on the cooperation between national statistical office and customs administration, which was eager to cooperate on data quality issues due to increased requirements; this input will also be used to improve section F;
73. Section E: welcomed the offer by the Philippines to provide a country example on institutional arrangements related to its National Statistical Coordination Board, which is a permanent committee composed of the secretaries of the various ministries of government responsible for coordinating all statistical activities;
74. Section F: welcomed offer by Canada to contribute additional inputs for section F;
75. Annex 5.1: noted that the current Annex 5.1(1) on USA experience does not fit with the context of the chapter, and welcomed the offer by USA to provide a new material for this Annex;
76. Annex 5.1: welcome offer by Mexico to amend Annex 5.1(2) to reflect work by the SNIEG (National System of Statistical and Geographical Information);
77. Annex 5.1: welcomed the offer by Brazil to provide editorial amendments to Annex 5.1(3);
78. noted that in Chapter 5 there is no specific mention of institutional arrangements at the international level, and although this is covered in other chapters, specific reference to the latter can be included in Chapter 5;
79. suggested either to amend title of Chapter 5 to more specifically limit its scope to the institutional arrangements at the national level or to properly indicate the scope of this chapter and its relationship with other chapters in the introductory paragraph;

Chapter 6: Statistical territory and organization of data collection

80. Paragraph 6.2: welcomed offer by Canada to provide its experience on the standardization efforts concerning the definition of territory and other metadata which are to be used across statistical domains;
81. Paragraph 6.5: welcomed the offer by Eurostat to review the accuracy of paragraph 6.5, and suggested a more neutral language in this paragraph as country practices may differ regarding adherence to the 1982 UN Convention on the Law of the Sea;
82. Paragraph 6.6: advised to be careful with the reference to specific definitions as these definitions are not necessarily agreed by all countries;
83. Paragraph 6.7, last sentence: noted that there may be the need to further clarify how this applies to the case of moving installations (like mobile rigs) which may intermittently be within or outside the statistical territory;
84. Paragraph 6.8, fourth sentence: suggested to revise language, to reflect and clarify that control and jurisdiction of outer space installations is usually linked to ownership and not to location of launch;
85. Paragraph 6.9: suggested to add a footnote to clarify “For IMTS purposes...”, to indicate that a decision was made in IMTS 2010 to continue using the previous distinction of commercial and industrial free zones originating from the Kyoto Convention and not anymore reflected in the same manner in the Revised Kyoto Convention;
86. Section B: reflect the existence of oversee territories;
87. Paragraph 6.10: welcomed offer by Brazil to provide an example on “export processing zones” (as opposed to industrial free zone);
88. Paragraph 6.12: welcomed offer by China to provide an example on treatment of domestic goods for exports stored in customs warehouses;
89. Paragraph 6.13: noted that some elements of the economic territory listed in section B should not be viewed as restricted to a specific geographic territory, it should be indicated that some countries define the elements of their statistical territory on the enterprise level; suggested to correct/ edit the third sentence;
90. Paragraphs 6.17 and 6.18: took note of the need for contributions; Brazil indicated its practice of using the special system for imports and the general system for exports; suggested to link this paragraphs to the use of custom procedure codes;

Chapter 7: Integration of data from different sources

91. Paragraph 7.1: suggested to amend and further elaborate paragraph 7.1 in order to provide guidance for a strategic choice between customs data and non-customs data and to better explain the limitations of customs data (e.g., statistical burden, under-declaration, misclassification for purposes of tax evasion, etc.) which however might not be the same across countries;

92. Paragraph 7.3: suggested to include under paragraph 7.3 also petroleum produced outside the customs territory and directly shipped by vessel;
93. Paragraph 7.4: suggested to include that it can be useful to users if data based on non-customs sources would be differentiated from data based on customs sources;
94. Paragraph 7.4 and 7.5: suggested to include some guidance on how to deal with data from different sources if that data are available in different levels of commodity detail, i.e. such in the case of shuttle trade; noted that goods that go through post/ mail are also difficult to classify at the commodity level, as there is no specific description for them;
95. Paragraph 7.7: welcomed Norway's offer to further elaborate its country example in paragraph 7.7;
96. welcomed Uganda's offer to provide an example of its experience in merging data from cross-border surveys, illustrating how survey data are transformed to make them compatible with customs data;
97. Paragraph 7.10: noted that the Intrastat survey mentioned in paragraph 7.10 is not a good example of data integration during compilation; instead, Intrastat and Extrastat data are compiled in parallel pipelines and only merged at the dissemination stage, with appropriate metadata indicating e.g., methodological differences regarding country of origin;
98. Paragraph 7.10: welcomed Eurostat's offer to provide an example of data integration during the compilation of trade statistics in the EU, illustrating how data sources for specific products (e.g., electricity) are used/ integrated;
99. Suggested to clarify that the integration of data can be either at the micro-data level or the aggregate level (or both), and that country practices can differ in this regard;
100. Paragraph 7.11: suggested to emphasize the need for conducting a validation step after data integration, e.g., as non-customs sources may have missing quantity data;
101. Paragraph 7.11: suggested to review bullet point (a) as it is not shared by participants; welcomed the suggestion of Germany to provide an example under (c); suggested to be more specific on (d) to indicate that data from some sources have simplified requirements;
102. suggested to mention the use of military expenditures as data source;
103. noted that the example mentioned in 7.11(c) is intended to illustrate estimation issues and not data integration issues;
104. suggested to re-write section E to better reflect its title (General conclusions on merging different data sources) without only focusing on providing country examples;
105. Chapter 7: suggested to refer in the title of the chapter not to the integration of data but to the compilation of IMTS based on multiple sources;

Chapter 8: Data processing and database management

106. Paragraph 8.2 and 8.3: welcomed WTO's offer to update footnotes 29 and 30 on page 64;

107. Paragraph 8.12: noted that full implementation of the electronic-to mobile (e2m) customs project in the Philippines was only in August 2010, and welcomed the Philippines' offer to send correction of paragraph 8.12 by e-mail;
108. Paragraph 8.13: welcomed Brazil's offer to provide amendments on paragraph 8.13 by e-mail;
109. Paragraph 8.17: suggested to expand paragraph 8.17 to include issues on knowledge management (on classification, database management, etc.), and welcomed Italy's offer to provide an example;
110. invited further examples on automated data processing;
111. Paragraph 8.21: agreed that trade flow still is required as there are different degrees of implementation of customs procedures code (CPC), but suggested to add a footnote on the use of CPCs for the identification of trade flows;
112. Paragraph 8.21: noted that some countries may have difficulties capturing net weight as required data field and only provide gross weight; however it is important to highlight that the recommendation is to provide net weight;
113. Paragraph 8.22: welcomed the Philippines' offer to amend text of this paragraph;
114. Table 8.2: suggested to change "port" to "point" in the first line of Table 8.2;

Chapter 9: Data quality: assurance, measurement and reporting

115. Paragraph 9.11: suggested to include in paragraph 9.11 some text indicating that coverage is affected by simplification of customs rules and that this is also an estimation issue (for trade below lower thresholds);
116. Paragraph 9.12: suggested to emphasize in paragraph 9.12 that asymmetries in partner information can be due to misclassification;
117. Paragraph 9.12: noted that asymmetries in partner information are also the result of different trade systems being used by different countries;
118. Paragraph 9.13: noted that Eurostat will provide a revised text for footnote 45; suggested to indicate the issue of quantity aggregation and that customs and the responsible agency work together on this issue;
119. Paragraph 9.19: suggested to write "validation rules" instead of "tests" in the second to last sentence of paragraph 9.19;
120. Paragraphs 9.21-9.24: welcomed offer by Eurostat to review text of paragraphs 9.21 to 9.24 and provide comments by e-mail;
121. Paragraph 9.36: noted the need to revise paragraph 9.36 as compilers would appreciate more details;
122. Paragraph 9.39: pointed out that terminology needs to be revised, consistently writing CIF value instead of CIF price;

123. Paragraph 9.40: suggested to write “differences in data *and methodology*” in paragraph 9.40(d);
124. Paragraph 9.43: suggested to emphasize in connection with paragraph 9.43 (f) that indirect trade in some cases represents a large share of total value, so it is important to include it as a point to verify in reconciliation studies;
125. Paragraph 9.43: pointed out that confidentiality is also a reason for differences in the data; suggested to mention triangular trade;
126. Paragraph 9.44: welcomed the offer by Canada to contribute the experience in reconciliation studies among the three countries Canada, Mexico and the United States;
127. Paragraph 9.46: took note that USA and Canada will review the text and provide a revised or amended version;
128. Paragraph 9.48: suggested to mention the use of SDMX;
129. Chapter 9: suggest to include some concluding remarks at the end of chapter 9, stressing that quality is a key issue in compilation, identifying priorities and a road map to make quality assurance operational, and providing references to quality issues in other chapters;
130. Annex 9.1: suggested to clarify and explain the terminology used, i.e. the term “framework” in paragraph A9.11;
131. Annex 9.3: suggested to provide a link between paragraph 9.43 and Annex 9.3, reflecting in the Annex any modifications made to paragraph 9.43;
132. Paragraph A9.36 suggested to add simplified reporting as a source of discrepancies;
133. Annex 9.4: pointed out that the old reference to an Annex 9.4 in paragraph A9.39 should be removed;
134. Annex 9.4: Suggested to remove specific reference to countries in paragraph A9.55;

Chapter 10: Data compilation in the case of customs union

135. Part A: suggested to clearly define “tariff union”, “customs union”, and “free market”, possibly in a text box;
136. Paragraph 10.4: suggested to add “which is a specific data collection system for intra union trade” at the end of paragraph 10.4 and to further emphasize this;
137. Paragraph 10.6: welcomed offer by Eurostat to provide amendments on coverage threshold in paragraph 10.6; Eurostat was invited to review the information on the Intrastat system;
138. noted that intra-EU trade statistics also cover data from customs sources and that Intrastat is just a collection system for these statistics (Eurostat was requested to confirm and further elaborate this point);
139. Paragraph 10.8: suggested to include “institutional arrangements” in the title of paragraph 10.8; suggested to move contents of footnote 64 (national vs. community concept) into the main text of the chapter;

140. Paragraph 10.11: pointed out that the last sentence of paragraph 10.11 should read “Rules and regulations” instead of “Regulations”;
141. Paragraph 10.13: welcomed the offer by the Philippines to provide additional text for paragraph 10.13;
142. Paragraph 10.14: noted that paragraph 10.14 will be updated on the basis of inputs received from the Customs Union Committee;
143. Paragraph 10.15: pointed out that a country cannot be member of two customs unions;
144. Paragraph 10.16: suggested to include text indicating that well run customs unions would need to establish a central statistical body;
145. Part C: suggested to include a section on long-term strategies in other chapters as appropriate and not only in Chapter 10;
146. Paragraph 10.20: noted that this paragraph seems to give custom unions too much flexibility in deciding which information is needed; thus, a sentence may be added stating that decisions should be compatible with, and fulfill IMTS 2010 recommendations;
147. Paragraph 10.22: noted that the European Union agreed to adopt a centralized customs clearance but that this is still far away from implementation;
148. Paragraph 10.23: suggested to add some text on the risk of double counting in multi country data exchanges;
149. Section D: suggested to consider adding a paragraph regarding the use of mirror data; agreed to remove any reference to single flow but to include the general idea of data exchange between countries;

Chapter 11: Integrating trade and business statistics

150. Section A: welcomed the offer by the Philippines to provide detailed information on the Statistical Committee of ESCAP’s Regional Program on Economic Statistics for Asia Pacific as an example of an integrated approach;
151. Paragraph 11.8: pointed out that paragraph 11.8 refers to taxonomy, not a framework and agreed to change the title of this paragraph; further, Type 1 refers to a reclassification process (Italy will be consulted on this paragraph);
152. Paragraph 11.8: welcomed that the USA agreed to provide its experience in generating, as the first country, information on trade operators by business characteristics;
153. Paragraph 11.12: agreed to clarify and properly use the terms “trader”, “exporter” and “importer” and welcomed Eurostat’s offer to provide input on this issue; the same applies to the terms “enterprise”, “establishment”, etc.;
154. Section E: suggested to mention the use of correlation tables to link trade and business statistics at the macro level, and welcomed the offer by Mexico to provide text on its experience in this regard;
155. Section E: welcomed offer by Brazil to provide a country experience based on a presentation made at the Global Forum in Geneva;

156. Section E: suggested to add a paragraph on trade in value added and related statistical work (Input output tables etc.);
157. Paragraph 11.10: noted that reference needs to be made to Aliceweb 2 (alicesweb2.mdic.gov.br);
158. Paragraph 11.13 and 11.14: welcomed offer by Italy to provide some text on FATS;
159. Paragraph 11.18: noted that in paragraph 11.18 reference needs to be made to the Ministry of Development, Industry and Foreign Trade, not to IBGE;
160. Paragraph 11.19: suggested to add “and other agencies” in the bracket of paragraph 11.19;

Part III Compilation of particular data items

Chapter 12: Time of recording

161. Paragraph 12.1: suggested to clarify that this paragraph refers to the statistical time of recording and to add a reference to IMTS 2010, indicating that there may be differences in terminology and practices across different countries (date of lodgement, date of release, date of assessment);
162. Paragraph 12.3: suggested to introduce the meaning of the abbreviation RKC for Revised Kyoto Convention at the beginning of the Manual, and to use this abbreviation consistently across all chapters;
163. Paragraph 12.12: pointed out that in paragraph 12.12 it should read “additional declaration” instead of “proper (final) declaration”;
164. Paragraph 12.4 and 12.12: noted that, in case there are two declarations (provisional (incomplete) and additional), both must be clearly linked and any applicable information from the additional declaration must be ascribed to the provisional declaration in order to avoid double counting; also stressed that the time of recording should be based on the provisional declaration;
165. suggested to add a paragraph on the problems associated with time of recording of transactions over fixed lines (e.g., pipelines, power lines, etc.) and to point out possible solutions; agreed to provide a cross reference to the chapter on pipeline trade;
166. pointed out that the use of additional sources for determining the time of recording must be limited to exceptional, important cases, due to practical considerations;
- Paragraph 12.18: Welcomed the offer by Eurostat to provide some text for this paragraph; noted that in the case of Eurostat, there are two options regarding time of recording for Intrastat: either the time of crossing the border or the taxable period (which is based on the invoice date);
167. Paragraph 12.19: suggested to indicate that change of ownership is only used/ applicable for specific goods;
168. Paragraph 12.20: welcomed offer by the United States to provide an example for the time of recording in the case of free zones;

Chapter 13: Commodity classification

169. Section A: suggested to make reference to quality issues and the difference of goods and services; suggested to provide information regarding the scope and intentions of this chapter;

170. Section B, C and D: agreed after discussion that while the information contained in section B, C and D is available in WCO publications, it is important to provide an overview of the HS and its rules for the interpretation in the Compilers Manual as there is a need from users; however, these sections should be made more concise and some of the materials put into annexes;

171. Section C: suggested that Section C should promote the application of HS 2012;

172. Paragraph 13.38 to 13.40: suggested to add some text stressing that assistance and training should be provided to traders to ensure proper classification;

173. Paragraph 13.41: noted that HS chapters 98 and 99 are free to use by WCO members as they see fit and therefore are not standardized, and welcomed offer by Eurostat to provide some illustration on how HS chapters 98 and 99 are used; pointed out that reference should be made to IMTS 2010 recommendation to limit the use of these HS chapters;

174. Paragraph 13.46: suggested to describe the use of HS in trade negotiations;

175. Section E: Pointed out that HS can be used for data presentation in various ways; indicated that for the use of HS for dissemination purposes descriptions at the 6-digit level need to be linked to corresponding 4-digit and 2-digit descriptions, and suggested to mention as a best practice the creation of full descriptions allowing the direct interpretation of the 6-digit HS codes; suggested to add a reference to the HS text that is available electronically at the WCO website;

176. Paragraph 13.47: noted that statisticians should limit the use of simplified classification based on certain customs procedures and some thresholds;

177. Paragraph 13.47: suggested to delete “difficult” from paragraph 14.47(a) (the HS is complex but not complicated) and elaborate more on the assistance which might be needed in some cases;

178. Chapter 13: suggested to indicate that the HS also provides a recommendation on quantity units and to provide a cross reference to the chapter on quantity measurement;

179. Sections F to K: agreed to move these sections to a separate chapter after the chapter on dissemination and to provide in the introductions to the amended chapter 13 and to the new chapter 26(b) clear descriptions of their respective scopes and the relationship; consider amending the title of Chapter 13;

Chapter 14: Valuation

180. Paragraph 14.9: agreed with the list of cost items and with the on them based tables 1, 2 and 3 provided in Sections B and C; suggested to mention that there are some aspects of the definition of statistical value which are specific to customs unions;

181. Paragraph 14.18: welcomed the offer by the Philippines to provide an example on the compilation of imports in FOB-value;
182. Paragraph 14.20: welcomed Brazil's offer to further amend its example;
183. Section D: noted that Mexico's Central Bank uses data from the US Department of Commerce as a supplementary source to value exports of some agricultural products, and welcomed a tentative offer to prepare a country example by the Specialized Technical Committee on Foreign Trade Statistics of Mexico;
184. Paragraph 14.29: welcomed the offer by Canada to prepare a country example on the distinction between customized and regular software and data validation of these two items based on detection of extremely large unit values in non-customized software; also welcomed Eurostat's and Italy's offer to provide further examples;
185. Paragraph 14.36: welcomed offer by FAO to provide an example on the use of commercial trade values in order to estimate the value of food aid; suggested to use the term "international aid in goods" to be consistent with comment on Box 2.5 above; took note that the United States (as the largest donor of food aid) considers to provide some input/ practices on the valuation of these exports;
186. Section D: welcomed offer by Italy to provide some text on its practices and guidelines on the valuation of goods that incorporate a significant share in services; however, some of the more conceptual considerations might be better included in Chapters 18-24;
187. Paragraph 14.44: welcomed offer by Germany to provide a description of the use of average exchange rates tables for currency conversion; welcomed offer by Brazil to provide a country example on how the Siscomext database is linked to the Central Bank to obtain official exchange rates; welcomed offer by Eurostat to provide an example of currency conversion using different exchange rates for customs data and in Intrastat; welcomed Canada's offer to provide some text illustrating the difficulties in determining exchange rates when individual transactions for exports (and in some cases, imports) are reported only as a monthly summary;
188. Section D/ Paragraph 14.36: suggested to include information and practices related to transfer pricing and intra-firm trade, e.g. indicating that unit values are not reliable in the case of intra-firm trade, and noted that while the problem has often been recognized, there is still need for information on best country practices;

Chapter 15: Quantity measurement

189. Table 15.1: suggested to update Table 15.1 with a reference to HS 2012 instead of HS 2007;
190. Paragraphs 15.1 and 15.5: welcomed WCO's offer to provide a revised text for paragraphs 15.1 - 15.5 and noted that WCO recommends using net weight while completing customs declarations;
191. Section B: suggested to change the title of this section to "Weight quantity concept", and to replace "weight figures" with "weight quantities";

192. Paragraph 15.17: welcomed WCO's clarification on the treatment of products whose packing material itself has a high value, noting that in those cases the packing material would be declared separately according to GIR 5 (for example, imports of gas in steel containers); however it was pointed out that the valuation of the products themselves and the packing material as two separate goods can be very difficult;
193. Section A: noted that WCO's standard units of quantity are an instrument for analysis purposes, but that countries are free to use additional units of quantity; noted that some of the units of quantity in the WCO recommendation might not be in line with the commercial practices in individual countries;
194. Section C and D: welcomed Eurostat's offer to provide an example on how quantity measurement is set at the level of the combined nomenclature;
195. Section C and D: suggested to mention some specific categories of goods whose quantity measurement may be problematic and may require special clarification (e.g., ornamental fish, wine, cosmetics, etc.);
196. Section D: welcomed Norway's offer to provide an example on direct reporting of petroleum products;
197. Section F: welcomed FAO's offer to provide an example on how net quantity data are used to convert quantity into calories, underlining the importance to exclude packaging;
198. Section G: welcomed Canada's offer to provide an example on the imputation of quantities based on an outlier-detection algorithm and the use of unit values;
199. Section G: welcomed the United States' offer to provide an example on the validation of units of measurement for exports;
200. Section G: welcomed Germany's offer to provide an example on the imputation of quantities;
201. Section G: welcomed Italy's offer to provide an example on a new methodology to impute quantities taking into account unit value profiles of individual operators (i.e., below commodity level);

Chapter 16: Partner country

202. Paragraph 16.6: suggested to write "non preferential rules of origin" in paragraph 16.6;
203. Paragraph 16.9: suggested to clearly define what is meant by "substantial transformation", noting that this is linked to the notion of country of consignment; welcomed the example by Uganda (35% of value added constitutes substantial transformation);
204. Paragraph 16.8: noted that the list of goods wholly produced in a country is taken from the Kyoto convention, but the list may not be exhaustive as for example it does not include wheat;
205. Paragraph 16.23-16.28: welcomed offer by Italy to provide an example on the determination of partner country for electricity and gas bought in electronic markets;

206. Paragraph 16.23-16.28: noted that in some cases the country of consignment is more relevant than the country of origin for dissemination purposes (e.g., antiques, used aircraft); in all such cases the use of country of consignment should be clearly indicated (e.g., “country of origin” data field might be left blank while “country of consignment” data field is properly marked);
207. Section D: noted that country of consignment is not part of the imports declarations in some countries and that the declaration would need to be amended;
208. Paragraph 16.38: indicated that change of ownership, substantial transformation and any other operations not linked with the transport can constitute operations that change the legal status of goods – however, more examples are required;
209. Section D: welcomed offer by Ukraine to provide an example on the determination of partner country in transactions with a member of a customs union;
210. Paragraph 16.47: noted that this paragraph needs to be amended to take in to account cases in which data on trade within groups of countries is not available (e.g., trade with France and Monaco);

Chapter 17: Mode of transport

211. Paragraphs 17.4-17.6; noted that UNSD will consider to work out the description and definition of different modes of transport;
212. Section B: noted that there is a strong correlation between point of entry and mode of transport (MoT), but that the attribution of MoT cannot be based on the identification of point of entry only and that countries appears to normally use mode of transport as indicated in customs records;
213. Paragraph 17.1: noted that information on MoT defined as means of transport when entering the economic territory and derived from customs records is not always the most relevant information for analytical purposes and that for some purposes predominant MoT is more useful;
214. Paragraph 17.15: suggested to distinguish sources of information for estimating MoT at different stages of the compilation process depending on user requirements: e.g., at the initial data collection stage (micro level, based on additional documentation for individual transactions) or at later data compilation stages (macro-level based, e.g., on enterprise surveys) (Eurostat to provide further input if required); noted that information on MoT is frequently not provided and needs to be imputed;
215. Section B: noted comment by Uganda, explaining that missing data on MoT for imports of specific commodities might be imputed using information on port of exit of these commodities;
216. Paragraph 17.24: welcomed offer by Mexico to review the text in Box 17.1;
217. Paragraph 17.25: welcomed the offer of Brazil to provide its practices on the dissemination of the information on MoT;

Chapter 17b: Customs procedures code

218. welcomed this chapter and recognized its importance;
219. Section E: welcomed offer by China to provide an example on the customs regimes (procedures) applied; information including the procedures used in Hong Kong would be highly welcome as well;
220. Paragraph 17b.9: noted that the ASYCUDA system uses customs procedure codes for determining the trade type (system) and flow; welcomed the offer of COMESA to provide a list of custom procedure codes used in ASYCUDA and their allocation to trade type (system) and flow; noted that while there is a strong relationship between customs procedures codes and trade flows, country practices differ and this relationship might not be perfect in some countries;
221. noted that in the European Union there are following elements of information: (1) customs procedure code, (2) statistical procedure codes, and (3) nature of transaction codes; customs procedure code defines the difference between general and special trade, while the transaction code determines other aspects like change of ownership;
222. welcomed offer by Eurostat to draft a paragraph on its experience on the use of the information on customs procedures;
223. welcomed the offer by the Philippines to provide a list of its customs procedures used;
224. Section C: noted that the information contained in the customs procedure codes may not automatically or for all countries translate into relevant statistical information;

Part IV Compilation of data on trade in selected categories of goods

Chapter 18: Scope of IMTS

225. Table 18.1: took note that goods for repair and maintenance are to be excluded but recorded separately;
226. Table 18.1: suggested to cover/ include the issue of re-exports in some form;
227. Section B: suggested to include an example of goods for consignment;
228. suggested to extend paragraph 18.14 with more country practices regarding trade in illegal goods;
229. Paragraph 18.15: agreed that the treatment of non-response should be further elaborated and suggested to review the cross reference with paragraph 2.28;
230. Paragraph 18.16: suggested to edit EU example and to put it into a text box and welcomed the offer of Eurostat to provide a proposal;
231. Paragraph 18.17: pointed out the importance to know about national practices and pointed out that while active confidentiality is generally used in business statistics, in trade statistics passive confidentiality is normally applied; noted that in Italy's experience foreign companies in partner countries are sometimes asking for more confidentiality;
232. Paragraph 18.17: emphasized that confidentiality should not result in under-coverage;

Chapter 19: Goods for processing

233. Section A: welcomed the Philippines offer to provide an example on semi-conductors;
234. Section A: noted that while countries have some freedom on what they define as goods for processing, it is necessary to have a clear definition and appropriate metadata in the interest of international comparability;
235. Paragraph 19.1: suggested to review the introduction to the chapter to emphasize the importance of goods for processing in the analysis of global value chains, and in the Balance of Payments (BoP) and National Accounts;
236. suggested to move paragraph 19.5 to an example in a box or an annex, as its content is not applicable to all countries;
237. Paragraph 19.7: noted that the items listed are taken from Eurostat practices and noted that a revised list will be provided shortly; suggested to make this list either more universally applicable and to include additional operations such as uranium for enrichment, oil refining, gold refining and/ or to provide some qualification that this might not be a universally accepted nor a complete list and maybe only a core/ minimum list;
238. Section B: noted that this list is also taken from EU practices but might be more universally applicable, which however should be further reviewed and indicated;
239. Section C: suggested to include information on how BoP defines processing (major and minor);
240. noted that in the European context goods for processing without change of ownership are identified using the nature of transaction code;
241. Section E: welcomed the offer of Morocco to provide an example on goods for processing as presented at the Global Forum in Geneva;

Chapter 20: Goods which cross borders as a result of transactions between related parties.

242. Paragraph 20.2: noted that IMTS 2010 adopted the definition of WTO for related parties as this was seen as the most operational definition from customs perspective and pointed out that the paragraph already indicates that countries might diverge from this recommendation;
243. Paragraph 20.2: emphasized that trade between related parties can have an impact on valuation of transactions, as shown by long-term studies of inter-company pricing;
244. Section B: Suggested to move the paragraph 20.5 on valuation quality control to the beginning of this section;
245. Paragraph 20.9: suggested to indicate that the variables exports and imports may not be mandatory; requested Italy to provide some further relevant inputs on FATS for this paragraph, if applicable;
246. Paragraph 20.11: suggested to reformulate paragraph 20.11 to take into account existing country practices and limitations;

Chapter 21: Electricity, gas, oil and water

247. agreed to change terminology to refer to pipeline trade;
248. suggested to include a cross-references to Chapter 3 on non-customs sources; however, emphasized that information available from customs should be obtained first;
249. Section A: suggested to emphasize the complexity of keeping track of physical movements of gas, oil, etc. due to the complexity of the pipelines themselves;
250. Section B: noted that it is difficult to exclude transit from these types of flows;
251. Section C: welcomed Norway's offer to provide a country example illustrating difficulties associated with customs data and the need to obtain information from other sources, including private companies and government; however, took note of the fact that the compilation system in Norway may change in the near future;
252. Section C: welcomed Italy's offer to provide a country example illustrating a new methodology for the treatment of transit imports coming from Switzerland, dealing with the issue of data quality;
253. Paragraph 21.11 (example China): noted the existence of inspection agreements in the case of oil pipelines;

Chapter 22: Ships and aircraft

254. discussed the scope of this chapter and noted that in the EU transactions on rigs for oil production are treated differently depending on whether they are fixed or floating, and that in the latter case they are treated as vessels;
255. Paragraph 22.7: noted that fishing vessels might be not registered in a standard way;
256. Paragraph 22.10: noted that IMTS compilers in Eurostat have submitted an inquiry to NA and BoP experts on how economic ownership is determined, and further clarification is expected shortly; emphasized that the economic ownership principle is generally well understood but is difficult to operationalize; noted that ownership of ships and aircraft is concentrated but financial arrangements can be complex and difficult to understand;
257. Section C: noted that the EU task force on this issue identified two basic approaches, the use of accounts of companies and the review of leasing contracts; noted that the possibility to review leasing contracts and agreements on vessel management to determine economic ownership is currently not used;
258. Section C: noted the need to identify non reported transactions and to verify reported transactions; welcomed offer by Eurostat to provide examples on the difficulties to identify whether the transaction should be included or excluded (these examples were prepared in the context of consultations with national accounts compilers in Eurostat).
259. Section E: welcomed offers by Canada, Italy (both on the use of different sources), Morocco, and Ukraine to provide an example on the recording of trade in ships and aircraft;

260. Paragraph 22.14: suggested to amend the title of this paragraph in order to indicate that it also discusses operational leasing; suggested to indicate, that dry leasing can be operational leasing as well;

Chapters 23 and 24: Other special cases and data compilation for national accounts and balance of payment purposes

261. endorsed this chapter which combines chapters 23 and 24 and suggested to clearly define its scope and to cover all relevant categories of goods within this scope; suggested to introduce cross-references to other goods, like trade in ships, covered in other chapters with the aim of providing a complete list; raised the issues of illegal trade and fictitious declarations (transactions that are recorded but do not take place) as a quality concern that may be cross-referenced to Chapter 18;

262. Paragraph 23.2: suggested to elaborate further regarding the distinction between goods and services and to refer to the SNA 2008 (and BPM6) which lists goods, services and knowledge-capturing products (para 6.13); took note of the use of unit values in Italy as an indicator of whether a good is bundled with services (issue of service content of good);

263. Paragraph 23.6: welcomed offer by Norway to provide an example on the compilation of government data on fish catch;

264. suggested to include a paragraph on duty-free shops (or in Chapter 6 or 17b, with cross references in Chapter 23);

265. suggested to include the issue of military goods and welcomed the offer by the Philippines to provide an example;

266. Section C: welcomed offer by Germany to provide an example on cooperation between trade compilers and BoP compilers, describing how they produce a reconciliation table within the European Union; welcomed offer by Mexico to consult with the Specialized Technical Committee on Foreign Trade Statistics on the feasibility of providing an additional example;

Part V Metadata and dissemination

Chapter 25: Metadata

267. Paragraphs 25.2 and 25.12: suggested to include in paragraphs 25.2 and 25.12 a structural metadata item that would allow users to link data sets under different HS versions in order to construct time series;

268. Paragraph 25.9: suggested to provide a more detailed description of the Data Documentation Initiative (DDI) and its possible applications within the context of international merchandise trade statistics;

269. Paragraph 25.10: welcomed the offer by Eurostat to provide an example of its metadata server RAMON;

270. paragraph 25.12: agreed as a good practice to make commodity descriptions available at any level of aggregation (including tariff line level) as part of the structural metadata;

271. Paragraph 25.12: Suggested to add “reporting country” as a structural metadata item in paragraph 25.12; suggested to write “the unit of measurement by HS code...” in paragraph 25.12(j);
272. Paragraph 25.13: suggested to write “Description of data sources used and their integration” in paragraph 25.13(c) ; suggested to include estimation of quantity in paragraph 25.13(e);
273. Section D: welcomed offer by Eurostat to provide an example on the use of its SDMX metadata extractor;
274. Section D: welcomed the offer of Brazil to provide an example on its presentation of metadata;
275. Section D: suggested to provide a footnote making reference to the current (and future) implementation of SDMX in UN Comtrade;

Chapter 26: Dissemination

276. Table 1: suggested to add reporting country and suggested to indicate that quantities are not to be aggregated above the 6-digit level;
277. Table 2: suggested to caution concerning any parallel provision of the second partner country as it may lead to confusion;
278. Table 3: suggested to clearly indicate that Table 3 does not refer to data at the transaction level (due to confidentiality);
279. suggested to rephrase paragraph 26.10, indicating the possible tradeoff between quality (size of revisions) and timeliness - e.g., it is not a good practice to publish frequently large revisions; welcomed offer by Brazil to provide some text on the need to take into account quality aspects when deciding on the frequency of publication;
280. Paragraph 26.12: suggested to write “not disseminated” instead of “not provided” in the third line of paragraph 26.12;
281. Paragraph 26.13: welcomed offer by Germany to provide an example of confidentiality rules (Box 26.3);
282. Paragraph 26.14: noted that in Canada confidentiality rules are themselves confidential, and suggested to emphasize that there is a tradeoff between transparency regarding providing the details of confidentiality rules and the ability to publish data without compromising confidentiality; suggested to write in paragraph 26.14 “publish an overview of their confidentiality rules” instead of “publish their confidentiality rules”;
283. Paragraphs 26.12 to 26.14: noted that some countries apply active confidentiality to all goods and not to only certain goods; suggested that it is a good practice to disseminate with the data a quantitative indicator of the amount of goods subject to confidentiality; suggested to include some text emphasizing the challenge of ensuring confidentiality across different classifications;

284. Paragraph 26.15: suggested to emphasize the need for a communication strategy and the need to coordinate revision policy with non-customs data providers which might be the origin of large revisions;
285. Paragraph 26.15(f): suggested to emphasize that the revision policy must ensure that consistency is maintained across raw data, seasonally adjusted data and indices;
286. Paragraph 26.15: suggested to include as a good practice the establishment of a vintage database to measure the size of revisions and generate quality indicators;
287. Paragraph 26.22 (second sentence): suggested to revise the language to focus more on helping users understand the data;
288. Paragraph 26.25: suggested not to discuss pricing issues and suggested to avoid making explicit recommendations in terms of free access as this is not a decision of data compilers (although country examples can be mentioned);
289. Paragraph 26.26: suggested to use the term “social media” in the main text of paragraph 26.26, although specific country examples can include references to “Facebook” and “Twitter”;
290. Section B: suggested to edit the title of Section B, writing “Integrated” instead of “Combined”;

Part VI External trade indices and seasonally adjusted data

Chapter 27: External trade indices

291. Paragraph 27.7 to 27.10: suggested to mention an “hybrid approach” as a third alternative for the compilation of foreign trade price indices;
292. Paragraph 27.16: requested to provide some guidance (in the form of references to other technical documents) to assist compilers in the choice of index formulas, including chained indices, although the choice of formula might depend on the specific situation in a country (country examples might provide some guidance in particular situations);
293. suggested to clarify the meaning of the acronym UVI in paragraph 17.16(b);
294. Paragraphs 26.16 to 26.19: suggested to encourage compilers to frequently update the base period (at least every five years) if a fixed base index is used;
295. Section D and F: welcomed offer by Italy to provide a country example on the compilation of chained price indices for external trade;
296. Section D and F: welcomed offer by FAO to provide an example of its methodology for the index calculation;
297. Section F: suggested to emphasize in the country examples the challenges faced by compilers (e.g., explaining why Germany is using enterprise surveys);
298. Section D: suggested to provide some guidance on methodological alternatives for the compilation of indices when there are missing observations;
299. Section D: suggested to provide some guidance on how to deal with changes in the HS classification that affect the calculation of external trade indices;

300. Section E: suggested to emphasize that the compilation process of trade indices must allow for feedback into the compilation of raw data, and vice-versa;
301. Section F: welcomed offer by Norway to update the country example on compilation of trade indices;
302. Section F: suggested to change the title of this section to “Country experiences”;

Chapter 28: Seasonally adjusted data

303. Paragraph 28.5: welcomed offer by the United States to provide a link to the Census Bureau website with the release of the X-13-ARIMA-SEATS method;
304. Paragraph 28.14: suggested to cross-reference with paragraph 26.15 on revision policy;
305. Section D: suggested that it is a good practice to maintain the model specification for seasonal adjustment as stable as possible over time, and to coordinate the timing of revisions to the model specification with the timing of major revisions of the raw data;
306. Paragraph 28.19: welcomed offer by the United States to provide some input on footnote 188 regarding the requirements for the length of the series;
307. Section F: Suggested to add a paragraph on the issue of non-additivity of seasonally-adjusted data;
308. Paragraph 28.24 and 28.25: suggested to mention as a good practice monitoring discrepancies between the trend of raw data and the trend of seasonally-adjusted data.
309. Section H: suggested to emphasize that seasonally adjusted figures should be consistent between trade statistics and national accounts; welcomed offer by Germany to provide an example on how seasonal adjustment of trade data is carried out in cooperation with the central bank;
310. Section H/ country examples: agreed to rename title of section H to indicate that this section will contain country examples; welcomed offers by the United States and Germany to provide their country experiences in the calculation of seasonally adjusted data for international merchandise trade;