

ENGLISH ONLY.

AD HOC GROUP OF EXPERTS
ON THE REPORTING OF DATA

Nairobi, 6-7 December 1990

PROBLEMS FACED BY DEVELOPING COUNTRIES IN REPORTING DATA
(PROPOSAL BY A SUB-GROUP)

The working group convened a small sub-group to identify and discuss problems which are serious obstacles in data reporting for many countries. The delegate of Sweden agreed to chair the meeting in which the following delegations participated: Congo, Finland, Guinea, Kenya, Singapore, South Africa, Sweden, Uganda and Burundi as observer.

After a discussion in which all the delegations presented their views, the group identified the following problems as most important to overcome in data reporting:

- Harmonized commodity system is not adequate for proper data reporting because it does not distinguish between the individual substance.
- Experience shows that the data from customs statistics are not accurate enough or not complete. The customs officers often do not have sufficient information and training to identify the controlled substances. The controlled substances are often imported under different trade-names when in mixtures.
- The information from the importing companies is often not available because they treat the data as confidential.

- In some cases the importing companies do not have enough knowledge to provide accurate data.
- In some countries the authorities lack sufficient know-how and finance to carry out the data gathering.

In some cases there exist problems how to report data, i.e.

- the case of South Africa which has the common customs with neighbouring countries some at which are parties and some are not.
- the refilling of ships systems with controlled substances in the foreign ports.

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Options for data reporting

The following different methods were identified:

- Import control with the help of the custom regulation and the Custom Tariff Code.
- Licensing of import and export of the controlled substances.
- Legislation on the reporting of data.
- Special survey of the consumption done by consultant or official body. Preferably with the co-operation of industry.
- Special survey of data as a part of a country study in a developing country.
- An international panel of manufacturing companies who can supply data for larger regions consisting of many countries.

The sub-group concluded that use of the customs code is not the best way of gathering data up till now and in the near future.

For developing countries the best way of gathering of data is generally to have special surveys done. Special legislation and licensing was thought to be more difficult to implement in the short run. There will however be a need for legislation in order to comply with the control measures of the Montreal Protocol.

Recommendations:

1. The UNEP Secretariat should gather and distribute experiences of data collection from countries that have successfully fulfilled the task, especially focusing on developing countries (existing experience is readily available from the Kenya and Fiji and also from the USA).
2. The UNEP Secretariat should compile and distribute a list of trade-names of chemical products including mixtures containing controlled substances.
3. Annex B and C substances should be taken into account by the Customs Co-operation Council in revision of the Harmonized Commodity System. This process has already been initiated by the UNEP Secretariat.
4. In the country studies made under the Inter-lateral Ozone Funds special notice should be taken to involve local experts and authorities in order to facilitate further reporting during the following years.
5. Developing countries with a very low consumption per capita may be allowed to report for the year 1986 that their consumption is well below 0.3 kg per capita.
6. Countries with Free Trade Zones inside their territory should take special notice to include these in their consumption figures.
7. The amount of controlled substances used for refilling refrigeration and fire extinguishing systems in foreign ports should be included in the consumption figure of the country with jurisdiction of the port.