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TRADE AND INTERNATIONAL POLICY

Making Free Trade Deals Work for Small Business: A Proposal for Reform of Rules of Origin

by
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- Rules of Origin requirements (ROOs) are a standard and necessary component of Free Trade Agreements (FTAs). By complying with those requirements, trading firms gain access to the preferential tariffs available under the FTA. Otherwise, firms must pay the full applicable tariff under Most Favored Nation (MFN) rules.
- The high costs of complying with ROOs have meant that small and medium-sized firms (SMEs) often find it cheaper and more efficient to pay higher MFN tariffs than to fulfill the ROOs' requirements. More problematic, the net effect is to discourage smaller firms from entering into international trade at all.
- The solution proposed in this E-Brief concerns the exemptions to ROOs rules: typically, the rules are waived for shipments with a face value of $1,000 or less. Instead of applying to the face value of shipments, the exemption should apply to the face value of the applicable MFN tariffs.
- Canada should adopt this reform as part of its "template" for negotiating future FTAs, including as an eleventh-hour modification to the Trans-Pacific Partnership to improve that deal's outcomes for SMEs.

Canada can improve its trade performance in two general ways – by helping existing exporters to export more, or by getting non-trading firms to enter international markets. Canada's free trade agreements (FTAs) aim to do both, but achieve less on both counts than they might. This is because the tariff-free access provided by these FTAs is not cost-free.

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Among the principal costs are those of demonstrating compliance with rules of origin (ROOs). ROOs are the gatekeepers to the tariff preferences that FTAs offer and they impose costs on trading firms that seek to use that gate – time costs, hassle factor, out-of-pocket administrative costs per shipment, fixed costs of maintaining records, and the risk that border authorities or government auditors will deny the claim for preferential access, resulting in an unexpected tax liability.

While putting a precise dollar figure on these costs is hard, we can infer their approximate size from the way they affect firm behaviour. Firms tend to comply with ROOs requirements to access FTA preferences for virtually all large value shipments that face high tariffs. Thus, when the amount of duty payable on a shipment is large, firms almost always choose to absorb the cost of complying with ROOs in order to enjoy the preferential access under the FTA. But usage rates fall for smaller shipments that face lower tariffs. Below a certain amount in out-of-pocket duty payable, firms choose to pay the duty rather than to absorb the costs of complying with ROOs.

Some of these costs are fixed – that is, they are the same whether the value of the shipment is large or small. This means they are proportionately larger for smaller shipments and thus fall disproportionately heavily on firms that tend to make smaller shipments, namely small and medium-sized enterprises (SMEs).

This has two undesirable consequences. First, it creates a bias against SMEs in competing for market share in the overall FTA zone. Second, based on modern firm-level trade theory and a compelling body of empirical evidence, we can infer that this deters some firms from taking the plunge into international markets altogether, thereby reducing the dynamic gains from trade from Canada's FTAs.

The problem with ROOs is well recognized and many reform proposals have been advanced. Most have encountered difficulties, including from vested interests benefiting from ROOs' potential role as non-tariff barriers; moreover, none of these proposals specifically targets the issue of SME use of FTAs. In this paper, I outline a "presumption of origin" proposal that would improve SME access to FTA preferences by modifying a specific feature of how ROOs are applied. I suggest why this proposal might find the political support to be adopted, how it would improve the performance of Canada's FTAs, and how it could indeed build support for FTAs currently under negotiation.

The key element of this proposal is to re-cast the standard *de minimis* rule for ROOs. The current rule exempts shipments below a stipulated face value from ROOs requirements. I propose the exemption change to one based on the face value of the "most favoured nation" (MFN) duty payable on the shipment.

As we shall discuss below, exempting shipments with an amount of duty payable that approximates the fixed costs of ROO compliance removes the disadvantage that SMEs face in utilizing FTAs. At the same time, framing the waiver threshold in terms of duty saved, rather than value of shipments, automatically limits the incentives to cheat, for example, by breaking up large shipments into smaller ones. That is because it establishes a sliding scale for exemption: shipments facing high tariffs (where incentives to cheat are high) would need to be commensurately smaller to benefit from the exemption than shipments facing low tariffs (where incentives to cheat are low).

All FTA ROOs regimes have *de minimis* rules – the current standard rule is a commercially meaningless US$1,000 face value of shipments – so the reform proposed here involves only a small wording change to existing rules, rather than starting from scratch on new rules. However, it constitutes a surgical strike that would measurably improve the functioning of NAFTA and the political prospects of agreements such as the Canada-

Europe Comprehensive Economic and Trade Agreement (CETA) and the Trans-Pacific Partnership (TPP) without materially compromising the enforcement of the FTA rules. Or so I claim – read on.

ROOs and Their Costs

Under World Trade Organization (WTO) rules, members are required to give non-discriminatory market access to each other through the MFN requirement – i.e., a WTO member must give every other member the same tariff treatment as it gives the "most favoured nation" under its tariff rules. However, when two or more members institute a free trade area that liberalizes substantially all goods trade among them, they are allowed to discriminate against goods produced elsewhere by charging lower, preferential tariff rates on goods produced within the free trade area.

In practice, the meaning of "goods produced within the free trade area" is laid out in highly complex rules of origin regulations. A simple indicator of the complexity of ROOs is that Canada's consolidated NAFTA ROOs regulations run to 556 pages of dense legal and technical text (by comparison, Canada's *Bank Act* runs to 787 pages). One reason for this complexity is that the tests applied to ascertain whether a product qualifies as "originating" vary from sector to sector: thus, different rules apply to textiles and clothing than to automotive products (see Box 1).

The rules that apply to some products can be very simple to state – crops grown in Canada are Canadian, what's a Canadian fish requires a few additional qualifications concerning the flag of the vessel on which the fish are landed. NAFTA drafters wasted few words in disposing of the question of the origin status of goods "taken from outer space" (spoiler: they qualify as NAFTA goods if taken from outer space by a NAFTA country or person). But the rules for originating status of goods that use imported inputs are more complex. Another – and more fundamental – reason for this complexity is the need to deal with all the possible ways in which an input product can arrive at a producer's factory door – it may for example have been transshipped through multiple countries, receiving some degree of processing in each that may or may not have changed its origin status. Moreover, the rules require an enforcement regime. ROOs regimes thus include rules for documentation, rules for logistics, rules for verification, rules for retention of records for audit, rules for appeal and adjudication of disputes, and so forth.

Complying with ROOs imposes administrative burdens.[1] A Certificate of Origin must accompany each shipment for goods to qualify for "originating" status and the supporting documentation requirements can be onerous.

- Assembly of documents from suppliers and customs agencies of transit countries.
- Record-keeping (up to seven years for post-entry audit in Canada under the NAFTA ROOs).
- Professional ROOs experts may be required on retainer.

1 Compliance with ROOs is not the only, or even necessarily the largest, cost that Canadian firms face when they trade across borders rather than sticking to the domestic market. Reducing border costs through regulatory and cooperation and border facilitation remains an important overarching objective of Canadian trade policy, with very large potential economic benefits. Reducing the difficulties that SME's face in complying with ROOs would complement these other initiatives – and it would be low-hanging fruit.

Box 1: Determining Origin within a Free Trade Area

The standard principles applied for the determination of origin within a free trade area are:

- goods are wholly produced within the free trade area (this is the case for mines, agriculture and fishery products);
- goods include imported inputs from outside the free trade area but these imported inputs are processed within the free trade area to a degree sufficient to have a change in tariff classification – e.g., from yarn to cloth or from cloth to clothing (the change in tariff classification or CTC rule);
- goods include imported inputs from outside the free trade area but the final goods have sufficiently high value-added from within the region to qualify as "originating" (the regional value content or RVC rule);
- some goods must meet both the change in tariff classification and regional value content tests, and in a few cases they must be processed in a specific manner to quality as "originating."

Not only do the rules vary from sector to sector but so does the restrictiveness of ROOs. For example, US-style ROOs for the clothing and textiles sector require that all the value added from the "yarn forward" be sourced from within the preference zone. The regional value-content rule for autos allows for some value-added from outside the preference zone but this figure is typically lower than for other products.

Similarly, depending on the good, the CTC rule can be satisfied if the processing of inputs results in their tariff classification being moved from one "chapter" of the classification system to another, or from one "heading" within a chapter to another, or even from a "sub-heading" to another.(e.g., from crude to processed vegetable oil). Obviously, changes at the chapter level require a greater transformation of an input than a change at the heading level, while even less transformation is required to change sub-headings.

- Risk of legal liability if Customs officials determine that a product did not qualify for preferential access – retroactive duties payable can run into the millions of dollars or equivalent in other currencies.[2]

ROOs costs are not neutral in their incidence. They vary across FTAs, depending on the complexity and transparency of the specific regime adopted. They vary by size of shipment, falling for larger shipments as the fixed costs are spread over larger value flows, hence the bias against small shipments. And they vary across

2 This becomes a more significant issue to the extent that zealous application of the minutiae of ROOs increases the non-tariff-barrier factor – as has been alleged in complaints by US industry in connection with the verification requirements that Korean customs officials have imposed in implementing the Korea-US FTA (KORUS). See Williams et al. (2014). This report suggests that the United States has had some success in alleviating these difficulties, using Korea's interest in joining the Trans-Pacific Partnership as leverage. Informally, similar concerns have been raised in Canada concerning US enforcement of NAFTA ROOs ("preference paranoia") – in a context where Canada lacks the leverage to discipline US practice.

products, depending on the specific type of origin rule that is applicable to the product,[3] and generally become more onerous in line with the complexity of products and the extent of international sourcing – and thus for products produced through global value chains.

A number of studies, utilizing different methodologies, different data sources and examining different ROOs regimes, have attempted to quantify the costs of ROOs compliance.[4] These studies establish a potential range of 1 percent to 7 percent when ROOs costs are expressed as a tariff equivalent. To the extent that there is a consensus, it is that when an MFN tariff is below about 4 to 5 percent, the costs of utilizing the FTA's tariff preference threaten to offset the potential benefits of the preference.[5]

Detailed analysis in Keck and Lendle (2012) adds to the picture. The authors studied FTA preference utilization by size of shipment and tariff rate for several countries, including Canada. For Canada, they show that FTA preference utilization is tied to size of shipment and tariffs payable. The share of trade fulfilling ROOs requirements to qualify for FTA benefits falls to 74 percent for shipments that are (i) in the range of $10,000 to $100,000; and (ii) eligible for FTA preferences (tariff reductions) of between 10 and 15 percent. For combinations of shipment size and tariff reductions below that, preference utilization falls to the 50 percent or lower level. The patterns for other countries in the Keck and Lendle data set (the United States, the EU, and Australia) are similar.

These data – however insightful – do not allow us to specify a tight relationship between preference utilization and the amount of MFN duty payable on a shipment. However, they do allow some generalizations: at duty payable of about $7,500, preference utilization shows some erosion; below $1,000 duty payable, preference utilization falls off sharply. Somewhere in this range is a reasonable cut-off for full application of ROOs administrative requirements.

Some Implications of ROOs Costs

Fixed trade costs deter trade – and the costs of complying with ROO requirements are not an exception. They discourage firms from taking advantage of FTAs and thus to some extent defeat the purpose of FTAs.

3 See Box 1 for an outline of the different types of rules that can apply to a product. A ROO that involves the regional-value-content test or other complex features, such as tracing, imposes much greater compliance costs than a ROO based on a tariff classification change, since for the latter the record-keeping requirements are significantly lower and are based on the producer's records for its imported inputs that are required for other legal reasons.

4 See Keck and Lendle (2012), Abreu (2013), and Ciuriak and Bienen (2014) for recent surveys and discussions of the availability of data and quality of the data on preference utilization. Details aside, US records on imports by tariff program provide the highest quality regular data on preference utilization. The EU also maintains records on preference utilization, albeit with less detail than the United States. These two jurisdictions have thus been studied the most. Good special compilations have been made by Canada and Australia as part of WTO transparency exercises. Data on Asia Pacific trade are limited and generally considered to be of poor quality. See the above mentioned sources for further discussion.

5 For example, Francois, Hoekman and Manchin (2006) find that, for preference margins below 4 to 4.5 percent, there are no incentives for traders to request preferences, since the costs of obtaining the preferences are expected to be higher than the benefits from obtaining the preferences. For FTAs to which Australia is a party, the Australian Productivity Commission (Productivity Commission 2010, 129) found utilization rates were 70-100 percent above a cut-off preference margin of 5 percent, while they were only around 30 percent for preferential margins below 5 percent.

Fixed costs matter primarily to firms that trade at smaller scales. Accordingly, we can reliably infer that smaller firms face the main deterrence to preference utilization. For some firms, this can also mean a decision not to enter into trade at all.

To be sure, Canadian SMEs can and do enter the international value chains of global corporations operating in Canada, and thus avoid the cost of complying with ROOs as well as other costs of accessing international markets. However, ROOs inevitably deter some SMEs from becoming exporters of final goods or accessing global value chains on a cross-border basis, either as exporters or as purchasers of intermediate inputs.

This reduction of trade among smaller firms is evidenced even in Internet-enabled trade, which is characterized by small enterprises making many small shipments directly to customers in many different markets. As discussed in Ciuriak and Melin (2014), FTAs support traditional trade but have not had a strong impact on technology-enabled trade.

Importantly, there are countless areas of opportunity for expansion in trade: each new product and each new market represents a new margin for a trading firm. The fact that ROO regimes vary across FTAs, means that trading firms need to "learn the ropes" for each new market, both in terms of the general application of the rules, the administrative requirements, and the product-specific features that apply to their products. Again, smaller firms with less administrative capacity are less well placed than larger firms to absorb these additional learning costs and to take advantage of the growing number of FTAs.

This bias against SMEs has a further, non-obvious consequence at the economy-wide level. Modern firm-level trade literature[6] shows that firms that enter into trade:

- benefit as exporters from knowledge spillovers ("learning by exporting");
- are induced to make efficiency enhancing investments ("learning to export"); and
- benefit as importers from access to higher quality production inputs available in global markets.

To the extent that ROOs discourage SMEs from entering international markets directly, they tend to weaken the competitive pressure in the domestic market that SMEs put on established, larger firms, which do benefit from FTAs. Thus, they detract from the competitive dynamics that drive industrial renewal within economies.

A History of Reform Initiatives

Rules of origin have long been a concern for the trading system, in part because they have been used as an instrument of trade protection.[7] The proliferation of preferential trade agreements has intensified this concern, while the emergence of global value chains has put the spotlight on the costs of compliance and enforcement (Jones and Martin, 2012; 1). Reform efforts and proposals for reform have focused on the following areas:

- making ROOs simpler, more transparent and predictable (e.g., US reform objectives as reviewed in Jones and Martin, 2012);

6 See, e.g., Keller (2009) for an extensive discussion of the spillovers from trade, and Ciuriak (2013) for a survey of the "learning by exporting" literature.

7 See, for example, Krueger (1993), Palmeter (1987), Erasmus et al., (2006), Chase (2007), and Jones and Martin (2012) for commentaries on this feature of ROOs.

- promoting convergence of rules across preferential trade agreements, including harmonization and standardization of certification and verification procedures (e.g., Estevadeordal et al. (2009; 127ff);
- "multilateralizing" ROOs by allowing for diagonal cumulation between countries that have all concluded agreements with each other (e.g., Baldwin 2006);
- liberalizing ROOs by lowering regional value content requirements (e.g., Mikic, 2005);
- raising the *de minimis* waiver threshold in its standard formulation (e.g., EU reforms for the Generalized System of Preferences); and
- waiving ROOs for low tariffs (Australian Productivity Commission proposal in study cited above).

Although it is possible to point to specific improvements that have been introduced over time,[8] progress on ROOs reform has been slow, in part because recommendations often face significant political opposition from protectionist lobbies and governments. For example, Australia's trade ministry rejected the Australian Productivity Commission recommendation for waiver of ROOs for tariffs below 5 percent out of concern for weakening the ability to enforce ROOs,[9] while Canada's efforts to reform ROOs have not met success with its trading partners. Proposals to simplify US ROOs were tabled in 1991, 1994 and again in 2008 but the issues remain alive.[10]

More importantly from the perspective of the current discussion, none of the threads in the reform discussion directly addresses the bias against SMEs. A better approach is to consider new rules that would narrowly target a reduction in the costs of accessing international markets for small and medium-sized businesses, while demonstrably limiting the risk of firms using the new rules to circumvent the purpose of ROOs, which is to favour production within a free trade area. This approach clearly would have a better chance of overcoming the political objections that have stymied thorough-going ROOs reforms – and provides the logic behind the "presumption of origin" (POO) proposal advanced in this paper.[11]

8 For example, the NAFTA provisions on fungible goods and materials, carried over into Canada's subsequent FTAs, sought to lower the costs of compliance by reducing the need to hold separate inventories. Time and out-of-pocket costs were also reduced by allowing producers and exporters to sign certificates of origin themselves as opposed to requiring them to be issued by a certification body. Some progress has been made in simplifying product-specific ROOs by, for example, replacing regional value content tests with tariff shift rules. As well, the recent WTO Trade Facilitation Agreement made two important liberalizing modifications to the multilateral ROOs regime by providing for self-certification of origin and by not requiring "non-manipulation certificates" for goods transhipped through third countries. I am indebted to referees for pointing out these examples.

9 Australia's Department of Foreign Affairs and Trade (DFAT) stated that: "Unless strong evidence could be assembled which provided a solid basis for concluding that the risk was low that the implementation of a waiver of the ROOs requirement would result in trade deflection and consequent welfare losses, DFAT could not support this recommendation" (Department of Foreign Affairs and Trade, 2010; 11).

10 See Jones and Martin (2012; note 10 and the associated discussion).

11 Canada could, of course, adopt a less restrictive approach to ROOs unilaterally: this would have a trade liberalizing effect that is independently positive for Canada (see Ciuriak 2014 on this point in the context of an argument concerning the benefits to Canada of unilateral liberalization). However, if Canada is concerned about getting Canadian SMEs into trade through FTAs, it should promote a rule that cuts both ways and works equally well for Canadian SMEs accessing our FTA partners' markets. This would have to be negotiated with FTA partners.

A Proposal for Reform

The proposal levers a technicality of ROOs chapters in FTAs. These chapters routinely include a *de minimis* margin, usually US$1,000, for the value of shipments that do not require certificates of origin. This seems absurdly small, especially as this value is typically not indexed to inflation. It is below commercial scale and equivalent to the value that Canadian consumers can bring in from abroad on vacation.

- The proposal recasts the existing *de minimis* rule in terms of face value of duty paid; for low tariffs, this allows much larger shipments to come in without certificates of origin (see Ciuriak and Bienen, 2014): for a tariff rate of 5 percent, a $1,000 duty payable waiver implies waiver for shipments of $20,000. This approximates the value of shipments at which a study by Gallezot and Bureau (2006) recommended the need for a certificate of origin be waived.
- For a tariff rate of 20 percent, the $1,000 duty payable waiver reduces the scale of shipment that can enter without origin certification to $5,000. This approximates the EU GSP regime for invoice declarations for shipments less than € 6,000.[12]
- For a tariff rate of 1 percent, however the waiver rises to include shipments of up to $100,000.

A waiver based on the size of the amount payable in duties thus constitutes a sliding scale for the size of shipments. This technical "tweak" results in several useful features, from the viewpoint of facilitating international trade by SMEs.

- The proposal targets the size of the fixed costs of ROOs compliance and thus targets SMEs.
- It automatically takes into account the risk of cheating because:
  (a) the waiver threshold rises for shipments facing lower tariffs where there is a lower incentive to cheat; and
  (b) the waiver threshold falls for shipments facing higher tariffs where there is greater incentive to cheat.

Expanding the scope for waiver of certificates does raise the scope for gaming the system. Clearly, it would be unwise to implement a regime that invites cheating since that could lead to a backlash. At the same time, it is important that concerns about enforcement do not undermine the purpose by forcing all importers and exporters to behave as if each and every shipment has to be legally "bullet proof" in terms of meeting origin criteria.

Changing the framing of the waiver from one based on face value of goods to face value of duty payable would leave in place other elements of the regime.

At the same time, where the current waiver does not allow commercial-scale trade, the proposed waiver would. Accordingly, to make the waiver both economically meaningful in stimulating trade while not undermining the general FTA regime, the various flanking provisions that go with the current waiver regime would take on more significance.

From an enforcement perspective, while the sliding scale is the first line of defence, the reforms I propose could include simple requirement of a "good faith" attestation that the producer of the goods is based in the alleged country of origin and has a production facility capable of producing the goods in question at an address

12 Commission Regulation (EU) No 1063/2010 of 18 November 2010.

in the alleged country of origin, and maintains business records in accordance with the laws of the alleged country of origin. This declaration would provide the essential basis for behind-the-border verification without requiring additional costs in terms of record keeping or exposing the exporter to liability for making claims concerning origin of the goods in question that might not subsequently be verified.

Such requirements would be similar to the NAFTA ROOs for casual goods which essentially only require that the imported goods be marked in accordance with the marking laws of the purported country of origin and indicate that the goods are the product of that country.[13] That being said, various degrees of due diligence could be demanded of traders in verifying supply chains to establish at least prima facie evidence of meeting origin requirements. Hopefully, a compromise could be reached before the perfect became the enemy of the good.

Behind-the-border verification could include post-import audits of both exporters and importers and statistical analysis of patterns of imports (e.g., to catch cases where individual shipments are broken up into smaller components to evade certification requirements). If an audit were to find evidence of obvious, wilful circumvention[14] (e.g., where a surge of imports into the destination country occurred in the context of a switch of sourcing of inputs to a low-cost third party source), remedies would be written into the regime.

From an administrative perspective, the proposal is technically feasible for customs departments to apply – customs officers need only look at the face value of duty payable, rather than the face value of the shipment, to see whether a certificate of origin is required or not. As for post-import verification and risk-based assessment, these methods are well established in Canada and many other countries and are increasingly being adopted by developing countries. Reinforcing the spread of these methods through FTAs would be a positive add-on benefit of the proposal (to the extent that this really would be additional to existing trends).

To summarize, the adoption of a presumption of origin regime would generate a number of major benefits compared to the status quo:

- increased small enterprise participation in trade, expanding the dynamic gains from FTAs;
- built-in scaling that addresses concerns about cheating;
- an approach to enforcement consistent with the trend by customs agencies to move to risk-based enforcement;
- greater leveraging of the e-commerce chapters in FTAs to drive trade expansion through entry of new firms in international trade;
- a fairer competitive framework for domestic competition in a world of proliferating FTAs; and
- increased economic gains from FTAs.

13 See, NAFTA Rules of Origin for Casual Goods Regulations, SOR/93-593. Note also that current waivers, such as under NAFTA Article 503, allow the parties to require as a condition for the waiver that the invoice accompanying the importation include a statement certifying that: (i) the good qualifies as an originating good; and (ii) the importation does not form part of a series of importations that may reasonably be considered to have been undertaken or arranged for the purpose of avoiding certification requirements.

14 The distinction between wilful and inadvertent violation of a trade rule has already been introduced into trade agreement enforcement regimes in the context of intellectual property rules. The standard for distinguishing between the two types of infractions typically is based on the notion that an action is undertaken by a person "knowingly, or having reasonable grounds to know."

Why This Is Important for Canada

Most of Canada's traders are SMEs. Canada's main trade policy tool today is the FTA, but SMEs face greater barriers to taking advantage of FTAs than do larger domestic competitors. Hence it is important for Canada to remove barriers to SMEs making the best use of the new opportunities that its hard-won trade agreements provide. The presumption of origin proposal in this paper would remove one important such barrier.

There is still time to get reforms into the agreements currently being negotiated. The TPP is well advanced. However, it would not be difficult for countries, practically at the stroke of a pen, to switch to this approach in the late stage of negotiations, and even apply it to agreements already ratified. Not only the economic results but also the political acceptability of many trade agreements would be enhanced by strengthening the provisions for utilization of the agreement by small enterprise.

The sharpened competitive sword of FTAs would cut two ways of course: Canadian firms – large and small – would feel greater competitive pressure in the Canadian domestic market from foreign SMEs. Further, the competition they face in the vital US market would be sharpened by third-party exporters taking advantage of the same provisions, if the United States were to embrace the proposal and apply it in its FTAs with third parties. To adopt this proposal, Canada would have to have the courage of its stated convictions that trade and competition are good for its economy.

Finally, FTAs are second-best solutions to the problems of optimizing trade regimes. A technical "fix" to the ROOs regime may by the same token be characterized as a Band-Aid and lacking in ambition. Without denying there is scope for more ambitious reforms – and many proposals have been put forward, some of them noted in this paper – as a practical matter, we live in an age of FTAs and the trade regime of the foreseeable future may be shaped largely by mega-regional trade agreements. Improving their design in a politically feasible way, based on improving access to their benefits for SMEs, would help in the all-important short and medium terms.

All reforms meet with resistance. To succeed, this proposal will require a champion to promote it and to refine the details in multiple forums: the WTO; specialized origin units within the World Customs Organization; the trade facilitation arms of the International Chambers of Commerce and small business associations; express carrier trade associations; e-commerce organizations; and others worldwide. It is in Canada's interest to be that champion.

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