

Dear Sirs

**RE: SLOW DOWN IN BORDER CONTROL PROCESSING TIMES**

We appreciate the operational challenges experienced by SARS due to the adverse circumstances caused by Covid-19. As one would expect, Customs is no exception. Our Customs workgroup has experienced a number of critical difficulties that can hopefully obtain urgent resolution. As you are aware, trade is key to South Africa's economic recovery and our comments should be seen in the light of trade facilitation without compromise to Government's revenue needs.

As a general matter, we can see that SARS management is trying its best to keep border post operations moving, but we sadly note that Covid-19 has taken its toll. Border control processes are indeed slower now, and greater suspicion appears to exist in terms of otherwise routine transactions. It is hoped that SARS customs operations can return to pre-Covid 19 levels at a faster pace. It is also hoped that the previous routine transport of goods will not remain under undue suspicion merely because of the existence of a post-Covid-19 change in institutional philosophy.

*Of bigger concern, however, are the border control operations performed by other relevant governmental agencies.*

- In terms of communication, only SARS appears to have a strategy in place. Other regulatory bodies that have a role in trade do not seem to have any coordinated communication strategy. There are no emails, website or other transmissions of regular communication. Processing of applications by these other departments has slowed to a fraction of pre-Covid 19 levels.
- By way of example, the Port of Health is one of the Departments that appears to have no visible strategy for handling stops nor does Port Health appear to have a visible strategy for documents / tested contingency plans (including the opportunity to allow electronic submissions via digital platforms). Moreover, there are no regular updates (via website or otherwise) that make users aware of the operational circumstances at the various seaports and land ports of entry.
- Other Port Health process concerns during COVID19 are set out below:
  1. PortHealth operational hours need to be aligned with those of SARS Customs to facilitate clearance processing turnaround time. According to feedback received, current actual working hours for the Port Health are between 09h00-15h00; whereas, the displayed operating hours are 08h00-16h00.
  2. There are no staffing contingency plans when Port Health offices close due to positive COVID cases nor are there viable remote option strategies to work outside the infected office. The net result is further backlogs, meaning that turn-around times have increased from 1 day to 4-to-5 days on average.
  3. Minimal staffing numbers during lunch breaks between 13h00 and 14h00 result in waiting times exceeding an hour (a real problem for private staff seeking to return to the office before allowed daily breaks).

4. Too many documents have to be transmitted manually versus an electronic access point that would provide speed of delivery and proof of receipt. Port Health should at least have viable central email addresses for submission and options for scanning.
  5. Turnaround times for documents submitted to Port Health are too slow. Files are often rejected for unnecessarily trivial reasons or simply attendant with increase requests for additional product literature. Each shipment is viewed with the same suspicion regardless of the importer's solid history, even when that solid history has been established with the same product.
- There is lack of clarity in terms of documented and defined/required standards and requirements for clearance of certain commodities. The result is that officers of different agencies are taking different interpretations in respect of the same commodity, making it difficult for importers to properly comply. Of recurring concern are the following items:
    - o Personal Protective Equipment (PPE's);
    - o Medication in small quantities (for example private patients on scripts); and
    - o Return to origin consignments of medication for private individuals.
  - Significant Delays during COVID19 are being experienced in terms of document processing or approvals by National Regulatory for Compulsory Specifications (NRCS). We recognize that SARS does not control the process as such; however, when shipments are held during clearance for these approvals, we found difficult to get response. This lack of response significantly contributed to delays encountered on urgent consignments.

While we realize that the affairs of other department are outside SARS's direct control, we are seeking advice on how to proceed given that SARS is in regular communication with these agencies in terms of border control matters and has a role with assisting stakeholders. Please advise on who we can engage with in terms of matters of this kind or whether we can arrange a joint meeting with the local border control teams in charge of coordinating these matters.

Regards



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