



## INFORMATION NOTE

# FREE TRADE ZONES, TRANS-SHIPMENT AND MULTILATERAL ENVIRONMENTAL AGREEMENTS

## I. Introduction

1. Free trade zones (FTZ) and trans-shipment operations are trade facilitation mechanisms designed to enhance efficiency of trade and attract investment. Permitted operations within FTZ, including trans-shipment, which can involve repackaging, relabelling, reloading, assembling and manufacturing goods, combined with more relaxed procedures and limited oversight, can also open doors for fraudulent activities.<sup>1</sup> This is particularly concerning for trade in environmentally sensitive commodities such as wildlife and timber products, hazardous chemicals and waste including e-waste or plastic waste, which are governed by legally binding provisions of different multilateral environmental agreements (MEAs), and related national laws.
2. This note aims to provide interested stakeholders with information on FTZ and trans-shipment in the context of MEAs affiliated with the Green Customs Initiative (GCI). The GCI is a partnership of international entities focused on strengthening the capacities of customs and border enforcement agencies to promote compliance with trade-related MEAs and related national laws.<sup>2</sup> The document highlights potential risks related to the monitoring and enforcement of trade related laws and regulations in FTZ and of trans-shipment operations and outlines existing mechanisms to strengthen them to enhance compliance with MEAs.

## II. Overview of Free Trade Zones and Trans-shipment

3. FTZ strategically located on international trading routes serve as hubs for commerce and trans-shipment activities. While they are known under various terms such as free zones, special economic zones, and export processing zones,<sup>3</sup> this note uses the term “free trade zones” for consistency. There are an estimated 7,000 FTZ worldwide, and their number is growing.<sup>4</sup>
4. FTZ offer a range of benefits to businesses such as exemptions from customs duties, reduced taxes and streamlined administrative processes. In addition, FTZ may provide other incentives such as simplified labour regulations, procedures for establishing businesses, and reduced compliance requirements, enabling companies to operate more efficiently.
5. Unlike transit, which refers to goods passing through as part of their travel, trans-shipment is a transport operation used to optimize logistics through consolidating or separating the shipment of goods. At a specific location, referred to as a trans-shipment hub, goods are transferred from one mode of transport onto another to complete the journey to the next destination. These hubs are often located in FTZ allowing businesses to benefit from the latter’s streamlined procedures and logistical advantages.<sup>5</sup>



6. Research and reports by the Organization for Economic Co-operation and Development (OECD)<sup>6</sup> and World Customs Organization (WCO)<sup>7</sup> highlight that with relaxed regulations and controls, fraudulent activities, including money laundering, tax evasion, and the trade in counterfeit or other illicit goods, take place at FTZ. Similarly, trans-shipment can enable fraud by allowing rerouting goods through intermediary countries, and obscuring their origin via changes in transport, making monitoring and enforcement more challenging.<sup>8</sup>
7. These mechanisms may be exploited as weak points in global trade chains including for illicit activities involving environmentally sensitive commodities. As the trade in these commodities is regulated by MEAs, ensuring robust monitoring of FTZ and trans-shipment operations is essential to prevent their misuse, maintain compliance with international environmental commitments and avoid environmental harm.

### III. International Customs Framework and National Approaches to Free Trade Zones and Trans-shipment

8. At the international level, the **Revised Kyoto Convention (RKC)**, formally known as the International Convention on the Simplification and Harmonization of Customs Procedures, provides a blueprint for modern customs procedures.<sup>9</sup> It consists of:
  - a. The **General Annex**, which sets out the core principles and standards for custom administration. These are binding on all contracting parties, and no reservations are possible with respect to their implementation.
  - b. **Specific Annexes** that contain standards and recommended practices for various customs procedures. A party may accept one or more of the Specific Annexes and submit reservations to Recommended Practices to the WCO. A reservation allows flexibility in adopting only certain practices within the adopted Annexes. FTZ operations and trans-shipment are covered by these Annexes.
9. As of April 2025, out of 137 contracting parties to the RKC, 34 have accepted the annex on FTZ and 41 have accepted the annex on trans-shipment.<sup>10</sup>
10. According to the RKC, a FTZ is “a part of the territory of a Contracting Party where any goods introduced are generally regarded, insofar as import duties and taxes are concerned, as being outside the customs territory.”<sup>11</sup> Similarly, the OECD defines a FTZ as “an area designated by a country or jurisdiction, where goods that enter this area are not subject, or are subject to lower import or export duties than those that would apply if such goods were declared for release for free circulation, at the moment when they enter it.”<sup>12</sup> The OECD excludes facilities used for temporary storage or for the customs warehousing procedure from its definition of FTZ.

# Free Trade Zones, Trans-shipment and Multilateral Environmental Agreements

## FTZ and Trans-shipment



FTZ are designated customs area with reduced or no import/export duties. Trans-shipment transfers commodities between transport modes to optimize trade routes.

While both are designed to facilitate trade, without proper oversight FTZ and trans-shipment may enable illicit activities. This is a concern for environmentally sensitive commodities, subject to specific trade controls and monitoring requirements under MEAs.

## International Standards for Customs Administration



International standards such as those under the Revised Kyoto Convention, WCO, and OECD promote uniform transparent customs procedures, strong legislation, and guide management of free trade zones and trans-shipment, aiming to balance trade facilitation with public security and environmental protection.

## Multilateral Environmental Agreements



MEAs regulate global trade in environmentally sensitive commodities like wildlife, timber, hazardous chemicals and waste. Their trade control provisions apply to parties as a whole, with most MEAs not specifically addressing FTZ or trans-shipment. Implementation specifics are left to national legislation and practices, also to be guided by international customs standards.

## National implementation of Trade Control Measures under MEAs and Customs Standards



Apply consistently customs administration standards and measures from MEAs such as export and import licensing and permitting systems, implementing a prior (formal or informal) informed consent mechanism, tracking shipment with unique identifiers, and reporting data to MEA secretariats to facilitate information and best practice exchange.

## Closing the Gaps

These measures, when implemented as a comprehensive strategy, will significantly enhance environmental protection while maintaining the benefits of trade facilitation mechanisms.

## Enhancing Inter-agency Cooperation and Capacity Building



Strengthen cooperation between environmental and customs authorities for more effective oversight and monitoring of trade in environmentally sensitive commodities in FTZ and trans-shipment. This supports information sharing, improves risk profiling and builds joint capacity for detection and prevention of illegal trade.

11. The WCO in its 2019 research paper<sup>13</sup> clarifies the existing misinterpretation of the FTZ definition under the RKC as "extraterritorial" and highlights that, in practice, customs play a limited role in the establishment and operation of FTZ due to insufficient authority. It also reiterates that under the RKC goods in FTZ are considered outside the customs territory only for duty and tax purposes, while the FTZ itself remains part of the customs territory.
12. Regarding recommended practices for managing FTZ and operations therein including trans-shipment, Standard 2 of Chapter 2 of Specific Annex D of the RKC states that national legislation should specify the requirements for establishing FTZ and the types of allowed goods and permissible operations in such zones. Standard 4 provides for customs authorities to have the authority to conduct inspections on goods stored within FTZ at any time.<sup>14</sup> The WCO "Practical Guidance on Free Zones"<sup>15</sup> makes recommendations to customs authorities on strengthening globally applied customs procedures in FTZ. For example, the need to enhance customs control and surveillance, including during the storage and processing stages of cargo, and to conduct audits in FTZ to combat illegal activities is emphasized.
13. The regulation of trans-shipment, which can take place also outside of FTZ, is set out in Chapter 2 of Specific Annex E. It defines a trans-shipment (see paragraph 5) and outlines procedures applied for a trans-shipment operation such as exemption from duties and taxes, declarations and customs clearance, time limits and control measures, emphasizing the role of customs in risk management.
14. Countries adopt varying approaches to the governance of FTZ and management of trans-shipment operations, as shown in the example below of selected countries, which are parties to the RKC. Among them, Singapore has accepted Annex D on FTZ and enacted specific laws and regulations about them, while China has accepted Annex D on FTZ with reservations. The European Union and the United Arab Emirates have not accepted Annex D.
  - **Singapore** operates 10 FTZ,<sup>16</sup> considered as special areas outside its customs territory. Under the existing regulation,<sup>17,18</sup> goods inside a FTZ are subject to customs oversight, and a trans-shipment permit is required where applicable.<sup>19</sup>
  - The **European Union** hosts 67 FTZ,<sup>20</sup> governed by the Union Customs Code.<sup>21</sup> Each member state can designate parts of its customs territory as FTZ, which are regarded as enclosed areas within the customs territory,<sup>22</sup> with restricted manufacturing and processing activities. All individuals, goods and means of transport entering or leaving FTZ may be subject to customs controls.<sup>23</sup>
  - **China** has established more than 171 FTZ since launching its first special economic zone in 1980. Designated as special control areas within China's territory and customs jurisdiction, FTZ are regulated by its Foreign Investment Law and Customs Law. The import or export of controlled goods between FTZ and overseas territories require obtaining necessary permits or authorizations.

- The **United Arab Emirates** operates 45 FTZ,<sup>24</sup> which are governed by the Common Customs Law for the Arab States of the Gulf. The law defines a FTZ as a part of the state's territory and considers any goods entering that zone as being outside the customs zone and thereby exempt from usual customs control and procedures as well as tariffs.<sup>25</sup> However, customs authorities have the right to carry out inspections for prohibited goods and review documentation in case of suspected illegal activity. There is also possibility of imposing restrictions for certain goods entering FTZ.

## IV. Free Trade Zones and Trans-shipment under MEAs

15. This section outlines provisions of some MEAs, partners to the Green Customs Initiative, that regulate the global movement of environmentally sensitive commodities. These treaties mandate their parties to establish controls over import and export of regulated commodities as a whole and most do not address FTZ, trans-shipment or transit specifically. Implementation specifics are understood to be left to individual parties' legislation and practices, which should be also guided by standards of the customs regime.

### *The Montreal Protocol on Substances that Deplete the Ozone Layer*

16. Parties to the Montreal Protocol are required to operate licensing systems for export and import of controlled substances (which are ozone depleting substances and/or greenhouse gases). Under Article 7 of the Montreal Protocol, parties are also obliged to report annual statistical data on the production, imports and exports of such substances. Under data reporting guidelines, countries with FTZ within their territories should make efforts to include data for such zones too.<sup>27</sup> However, no specific provision in the Protocol itself requires parties to report trade through FTZ, and the Secretariat has been receiving data mentioning FTZ only from a few parties.
17. Decisions<sup>28</sup> of the Meetings of the Parties clarified the difference between trans-shipment and imports/re-exports of controlled substances. In trans-shipment, the responsibility for reporting Article 7 data lies only with the country of origin as the exporter and the country of destination as the importer. In the case of imports and re-exports, the intermediate country should report both the import and export of the substances, while the countries of origin and of destination would report the export and import respectively, thus ensuring the consistent and accurate tracking along the trade chain.
18. In subsequent decisions, parties are encouraged to better monitor international transit trade through measures such as to include the re-exports and transit of controlled substances in their mandatory import and export licensing systems, or assigning a unique consignment reference number to each shipment with a view to combatting illegal trade more effectively.<sup>29</sup> Although there is no such obligation under the Montreal Protocol, several parties, including major traders like China and the EU voluntarily participate in an informal prior informed consent system for exchanging

18. information before trade takes place, which can also cover transit and trans-shipment operations and trade through FTZ.

### ***The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal***

19. The Basel Convention defines controls for the transboundary movement of hazardous wastes and other wastes. While it does not specifically reference trans-shipment or FTZ, its provisions, which apply to all parties as a whole, regardless of specific national circumstances, offer guidance on how to handle to transboundary movement of concerned shipments including through such areas.
20. Under the Convention, transboundary movement means any movement of hazardous wastes or other wastes from an area under the national jurisdiction of one State to, or through, an area under the national jurisdiction of another State or to, or through, an area not under the national jurisdiction of any State, provided at least two States are involved in the movement.<sup>30</sup>
21. Wastes falling within the scope of the Convention can be shipped across international boundaries only if certain conditions are met and only in accordance with certain procedures.<sup>31</sup> The Convention has established a notification and consent procedure, requiring the prior informed consent (PIC) of a State of import and State of transit before waste can be exported. Specifically, if the waste movement is via one or more transit parties, these countries must also be notified and consent to it as part of the control procedure (unless they have waived this right). They retain the right to perform checks and verify the accompanying documentation. Parties are obligated to report information on transboundary movements in which they have been involved, through the secretariat, to the Conference of the Parties.<sup>32</sup>
22. However, owing to parties' different regulatory definitions and understandings to the term "transit", parties have encountered some challenges during the implementation of the PIC procedure.<sup>33</sup> Some parties adopt the practice of excluding stops in the FTZ from the definition of "transit".<sup>34</sup> The Conference of Parties to the Basel Convention in 2022 adopted guidance on implementation of transit transboundary movements that emphasizes the need for parties to inform each other of their national definitions of 'transit' in connection with the application of the Basel Convention.

### ***The Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade***

23. The Rotterdam Convention does not include any reference to trans-shipment and free trade zones, but it focuses on facilitating the exchange of information about the characteristics of controlled chemicals, enabling national decision-making processes on their import and export, and disseminating decisions on the import and export of such chemicals to parties.
24. It defines export and import as the movement of a chemical from one party to another party, excluding mere transit operations.<sup>35</sup> To promote shared responsibility and cooperative efforts

- 24.** among parties in the international trade of hazardous chemicals, the Convention applies the PIC procedure and information exchange mechanism. Parties are encouraged to establish national coordination mechanisms to facilitate the exchange of information among relevant authorities responsible for implementing and enforcing the provisions of the Basel, Rotterdam and Stockholm (BRS) Conventions related to the control of the export and import of the chemicals and wastes covered by these treaties.
- 25.** Additionally, the Convention provides that if any Party requires information on transit movements of chemicals subject to PIC procedure through its territory, it can report this need to the Conventions Secretariat, which then will inform all parties accordingly.<sup>36</sup>

### ***The Stockholm Convention on Persistent Organic Pollutants (POPs)***

- 26.** The Stockholm Convention establishes measures to reduce or eliminate releases of POPs from intentional and unintentional production and use, stockpiles and wastes. It regulates the import and export of intentionally produced POPs, listed in Annexes A (elimination) and B (restriction). Trade in POPs is permitted only under specific conditions such as for the purpose of environmentally sound disposal or uses permitted by the importing party under the Convention. All other imports and exports of these substances are prohibited.

### ***The Minamata Convention on Mercury***

- 27.** The Minamata Convention contains provisions for export and import between parties as well as with non-parties, sound interim storage of mercury and management and disposal of mercury as waste. Its Article 3 establishes detailed procedures for countries to provide consent to imports of mercury for allowed uses under the Convention or Article 10 for environmentally sound interim storage.
- 28.** The need for optimizing the written consent procedure for the import of mercury, including the provision of information on transit countries, re-export points and the role of free-trade zones has been brought up at the meetings of the parties but has not led to a specific decision to this end.

### ***The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)***

- 29.** CITES provides clear guidance on transport and well-being of live specimens during transit/trans-shipment.<sup>37</sup> It defines trans-shipment as transfer of a specimen from one carrier or form of transport to another<sup>38</sup> and treats transit as the passage of a specimen across or through a country that is neither its country of origin nor its country of destination.<sup>39</sup> Resolution of the Conference of Parties Conf 9.7 (Rev. CoP15) on transit and trans-shipment specifies that each Party must apply the Convention over the whole of its territory and that the Convention does not make any provision for the exclusion of areas or zones under special regimes, such as duty-free shops, free ports or non-customs zones.<sup>40</sup>
- 30.** CITES regulates the international trade in specimens of species included in its three Appendices



30. through a licensing system. Permits or certificates are required for all imports, exports, re-exports, and introductions from the sea of species covered by CITES. Moreover, where appropriate and feasible, management authorities may affix a mark upon any specimen to assist in identifying the specimen.<sup>41</sup> Specimens in transit or trans-shipment are exempt from permit requirements provided they remain under customs controls of that party.<sup>42</sup> In addition, Articles III, IV, V and VIII and Resolution Conf. 10.21 (Rev. CoP19)<sup>43</sup> provides guidance<sup>44</sup> on the well-being of live specimens during transit/trans-shipment, emphasizing the importance of having appropriate conditions such as facilities, temperature, storage, etc., in place especially for live animals.

## **V. Strengthening the Monitoring and Control of Trade in Free Trade Zones and Trans-shipment operations**

31. International standards and practices particularly those recommended under the RKC and related guidance from the WCO and OECD, provide a framework for customs administration. These standards promote uniformity and transparency in national procedures and legislation, including FTZ and trans-shipment management. While aimed at trade facilitation, these recommendations also emphasize the importance of maintaining appropriate controls for restricted and prohibited goods. Such controls support compliance with MEAs and other relevant international and regional agreements and regulatory frameworks.
32. The relationship between MEAs and trade conducted at FTZ or through trans-shipment varies by agreement. Some MEAs, such as CITES, explicitly address these trade mechanisms, while others regulate transboundary movements as a whole. Where MEAs do not explicitly mention FTZ or trans-shipment, their trade control provisions are generally understood to apply across a party's jurisdiction covering all forms of trade. However, the absence of explicit references to FTZs or trans-shipment may lead to regulatory gaps at national level due to the specialized nature of these mechanisms. These gaps can be addressed by consistently applying measures already set out under these MEAs, such as licensing and permitting systems for import and export of environmentally sensitive commodities, implementing a prior (formal or informal) informed consent mechanism, assigning a reference number for shipment tracking, reporting relevant data and information to MEA secretariats for data and good practices sharing among parties. Combined with adherence to customs administration standards provided under the RKC and related guidance from OECD, these measures can help countries strengthen their management of trade in restricted and prohibited commodities at FTZ, in transit and trans-shipment.
33. Effective implementation of both customs and environmental controls in FTZ and trans-shipment operations requires robust coordination and cooperation among multiple authorities. This approach promotes the integration of environmental considerations into customs risk profiling systems, facilitates timely information exchange between relevant authorities, and strengthens joint capacity for detecting and preventing illegal trade. These measures, when implemented as a comprehensive strategy, will significantly enhance environmental protection while maintaining the benefits of trade facilitation mechanisms.

## VI. Endnotes

<sup>1</sup> Polner M. and Kagawa S., "[Addressing Challenges Related to Customs Controls in Free Zones](#)," WCO News, no. 87 (October 2018).

<sup>2</sup> [Green Customs Initiative](#).

<sup>3</sup> For example, Facility for Investment Climate Advisory Services (FIAS), Special Economic Zones: Performance, Lessons Learned, and Implications for Zone Development (Washington, DC: World Bank Group, 2008); International Labour Organization (ILO), Trade Union Manual on Export Processing Zones (Geneva: ILO, 2014).

<sup>4</sup> Myles D. (12 October, 2023), "[A world ripe for free zones](#)," fDi Intelligence, "UNCTAD counted 500 free zones in 1995, 3,500 in 2006 and 5,400 in 2018. The World Free Zones Organization (WFZO) now counts more than 7,000 of them."

<sup>5</sup> OECD/EUIPO (European Union Intellectual Property Office) (2018), "[Trade in Counterfeit Goods and Free Trade Zones: Evidence from Recent Trends](#)," OECD Publishing, Paris/EUIPO, p. 15.

<sup>6</sup> Ibid

<sup>7</sup> WCO (September 2019), "[Extraterritoriality of Free Zones: The Necessity for Enhanced Customs Involvement](#)," Research Paper No. 47.

<sup>8</sup> WCO (December 2020) "[Practical Guide on Free Zones](#)," p. 16.

<sup>9</sup> Polner M. and Kagawa S., (October 2018), "[Addressing Challenges Related to Customs Controls in Free Zones](#)," WCO News, no. 87.

<sup>10</sup> 6 of 34 Contracting Parties, including China, the Republic of Korea, Mauritius, Philippines, Uganda, and United States, acceded to the Annex with reservations, see at <https://www.wcoomd.org/-/media/wco/public/global/pdf/about-us/legal-instruments/conventions-and-agreements/revised-kyoto/pg0339ea.pdf?la=en>.

<sup>11</sup> Text of Specific Annex D, Chapter 2 of "[International Convention on the simplification and harmonization of customs procedures](#) (as amended)" called also "The Revised Kyoto Convention", accessed April 19, 2025

<sup>12</sup> OECD Council Recommendation of the Council on Countering Illicit Trade: "[Enhancing Transparency in Free Trade Zones](#)" (adopted on 21 October 2019).

<sup>13</sup> WCO (September 2019), "[Extraterritoriality of Free Zones: The Necessity for Enhanced Customs Involvement](#)," Research Paper No. 47.

<sup>14</sup> WCO "[Revised Kyoto Convention](#)", accessed April 19, 2025

<sup>15</sup> WCO (December 2020) "[Practical Guide on Free Zones](#)"

<sup>16</sup> Singapore Customs, "[Authorised Piers and Places](#)," accessed March, 2025.

<sup>17</sup> "[Free Trade Zones Act 1966](#)," Singapore Statutes Online, accessed March, 2025; "[Free Trade Zones Regulations 1969](#)," Singapore Statutes Online, accessed March, 2025; Singapore Customs, "[Free Trade Zones Act and Subsidiary Legislation](#)," accessed March, 2025.

<sup>18</sup> According to Section 2 of Free Trade Zones Act 1966, "customs territory" means Singapore and the territorial waters of Singapore but excluding any free trade zone. Also, in Section 11 (4), it provided that the authority shall provide adequate enclosures to segregate the free trade zone from customs territory for the protection of the revenue, together with suitable provisions for the movements of persons, conveyances, vessels and goods into and from the free trade zone.

<sup>19</sup> The trans-shipment and transit of goods through Singapore are regulated by various regulations such as the Customs Act, the Regulation of Imports and Exports Act, the Strategic Goods (Control) Act.

<sup>20</sup> European Commission (August 17, 2022), "[Free Zones Which Are in Operation in the Customs Territory of the Union, as Communicated by the Member States to the Commission](#)."

<sup>21</sup> On 22 February 2024, the EU's Internal Market Committee adopted its position on the EU Customs Code reform that will restructure the way customs authorities work in the EU. The proposed reforms include: (i) a new approach to e-commerce for goods coming from outside the EU, (ii) more efficient customs checks and targeted controls and (iii) a new EU DataHub for the submission of information to EU customs authorities. The draft report was adopted in the committee and will be put to a vote at an upcoming plenary session and constitute Parliament's position at first reading. The file will be followed up by the new Parliament after the European elections on 6-9 June 2025. See <https://www.europarl.europa.eu/news/en/press-room/20240219IPR17819/first-vote-on-the-biggest-eu-customs-reform-since-1968>. Section 3 of the proposal provides regulations on free trade zones but does not change the critical characteristics for monitoring. The text is available at [https://www.europarl.europa.eu/RegData/docs\\_autres\\_institutions/commission\\_europeenne/com/2023/0258/COM\\_COM\(2023\)0258\\_EN.pdf](https://www.europarl.europa.eu/RegData/docs_autres_institutions/commission_europeenne/com/2023/0258/COM_COM(2023)0258_EN.pdf).

<sup>22</sup> Article 243 in Title VII, Chapter 3, Section 3 ("Free zones") of the UCC states that member States may designate parts of the Customs territory of the Union as free zones, and free zones shall be enclosed, available at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013R0952>, page 77.

<sup>23</sup> Article 243, paragraphs 3 and 4 of the European Union Customs Code.

<sup>24</sup> Ministry of Economy - UAE, "[Free Zones](#)," accessed March, 2025; and International Trade Administration, "[United Arab Emirates - Customs Regulations](#)," accessed March, 2025.

<sup>25</sup> Tariffs are the fees charged by a government on goods that are brought into a country, and they are a common form of taxation in international trade. Paragraph 32 of Article 2 and Article 3 in Section 1 of the [Common Customs Law of the GCC States](#), accessed in March, 2025.

<sup>27</sup> [UNEP/OzL.Pro.3/11](#), annex XI, para. 7 and [UNEP/OzL.Pro.5/7](#), annex, para. 7.

<sup>28</sup> Specifically, decisions [IV/14](#) on Transshipment of controlled substances and [IX/34](#) on Compliance with the Montreal Protocol

<sup>29</sup> Decision [XIX/12 on Preventing illegal trade in ozone-depleting substances](#)

<sup>30</sup> Article 2.3 of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, p. 8, available at <https://www.basel.int/TheConvention/Overview/tabid/1271/Default.aspx>.

<sup>31</sup> Articles 4, 6, 7, 8, 9 and 13.

<sup>32</sup> Article 13.3 of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, p. 8.

<sup>33</sup> In relation to the implementation of the PIC procedure, at its fifteenth meeting, the Conference of the Parties (COP) adopted guidance on the implementation of paragraph 4 of Article 6 of the Basel Convention on transit transboundary movements of hazardous wastes and other wastes.

<sup>34</sup> Footnote 66, Guidance on the implementation of paragraph 4 of Article 6 of the Basel Convention on transit transboundary movements of hazardous wastes and other wastes, 2022.

<sup>35</sup> Article 2 (f), available at <https://www.pic.int/TheConvention/Overview/TextoftheConvention/RotterdamConventionText/tabid/1160/language/en-US/Default.aspx>.

<sup>36</sup> Article 14, Clause 5, available at <https://www.pic.int/TheConvention/Overview/TextoftheConvention/RotterdamConventionText/tabid/1160/language/en-US/Default.aspx>.

<sup>37</sup> Resolution Conf. 10.21 (Rev. CoP19), available at <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-10-21-R19.pdf>.

<sup>38</sup> The Conference of the Parties recommends in Resolution Conf. 9.7 (Rev. CoP15) that, for the purpose of Article VII, paragraph 1, of the Convention, the phrase 'transit or trans-shipment of specimens' be interpreted to refer only to: a) specimens that remain in Customs control and are in the process of shipment to a named consignee when any interruption in the movement arises only from the arrangements necessitated by this form of traffic. b) The cross-border movements of sample collections of specimens that comply with the provisions of Resolution Conf. 12.3 (Rev. CoP19) and are accompanied by an ATA carnet. <https://cites.org/eng/resources/terms/glossary.php#>.

<sup>39</sup> The Conference of the Parties recommends in Resolution Conf. 9.7 (Rev. CoP15) that, for the purpose of Article VII, paragraph 1, of the Convention, the phrase 'transit or trans-shipment of specimens' be interpreted to refer only to: a) specimens that remain in Customs control and are in the process of shipment to a named consignee when any interruption in the movement arises only from the arrangements necessitated by this form of traffic. b) The cross-border movements of sample collections of specimens that comply with the provisions of Resolution Conf. 12.3 (Rev. CoP19) and are accompanied by an ATA carnet. <https://cites.org/eng/resources/terms/glossary.php#>.

<sup>40</sup> <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-09-07-R15.pdf>.

<sup>41</sup> Article VI, Clause 7 of CITES, available at <https://cites.org/sites/default/files/eng/disc/CITES-Convention-EN.pdf>.

<sup>42</sup> Article VII, Clause 1 of CITES, available at <https://cites.org/sites/default/files/eng/disc/CITES-Convention-EN.pdf>.

<sup>43</sup> <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-10-21-R19.pdf>.

<sup>44</sup> The [CITES guidelines for the non-air transport of live wild animals and plants for non-air transport](#) and [IATA live animals regulations and perishable cargo regulations for air-transport of specimens](#).

## Acknowledgements

The information note was drafted by Yiwei Zou (UNEP) and Liazzat Rabbiosi (Ozone Secretariat). The following individuals contributed to the review of the note: Anna Kobylecka (WCO), Jackline Wanja Wanjiru (BRS Secretariat), Lara Ognibene (Minamata Convention Secretariat), Pia Jonsson (CITES Secretariat), Peter Deupmann (CBD Secretariat), and Tatiana Terekhova (UNEP). The authors are also grateful for the time and contributions of Dr. Jin Wang (Peking University), Dr. Janusz Kozakiewicz (independent expert), Eleanora Salluzzi (International Trade Centre), and Birgit Viohl (World Trade Organization). Overall coordination was provided by Aphrodite Smagadi and Valentina Ricca (UNEP). Layout and graphic design by Murat Özoğlu.

# GreenCustoms

The Green Customs Initiative (GCI), launched in 2004, enhances the capacity of customs and border control officers to enforce and foster compliance to trade-related conventions, MEAs, and corresponding national legislation. GCI focuses on commodities such as ozone-depleting substances, toxic chemicals, hazardous wastes, endangered species, and living-modified organisms.

The initiative is a forum for coordinated and cost-effective development of tools, delivery of training, and awareness-raising of customs officers and border control officers, through leveraging its partners' resources and expertise. It complements and enhances existing customs training efforts under the respective agreements. For some of the MEAs involved, GCI is the structured means of interaction with the customs community.

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