Self Certification System in Japan

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Advantages

- Shorter lead time than CO
- Less paperwork than CO
- No issuing fee
- Keep confidence to Origin Declarations (because of government approval)
Major Challenges

• Setting approval criteria
  - Workable
  - Clear and simple

• Need improvement of users’ compliance
  - Already approved exporters
  - Other exporters
Exporters with “sufficient knowledge and competence for conducting operations of producing an origin declaration properly and reliably” proved by facts such as

- obtaining preferential COs regularly
- having certification personnel (with certain experiences)
- having senior officials responsible for compliance, and
- presenting flow of entire certification process
- maintain close contact with METI/producer(if any)
Improving Compliance

1. Additional Obligations for Approved Exporters

In addition to preservation of documents proving originating status...

Recordkeeping of own declarations
  e.g. date of issuance, HS code/name/volume of goods, invoice number, name and address of importer

Notification of noncompliance, major changes
  e.g. lack of originating status or major errors in origin declarations, change of company name/address or goods to be exported

Renewal of approval (every 3 years)

- Penalty, sanction (such as withdrawal of approval) applied against violations
- METI can issue orders to report/make correction and conduct inspection
2. Guidelines for In-House Examination

- Contains examples of CTC/VA examination worksheet, list of available support documents, basic idea of ROO
- Several guidelines released (general, textile, chemical products)

**Examples of worksheet for CTC/VA examination**

- HS# and name of all components
- Points to be considered in examination
- Name, cost, and originating status of all components
- Name and FOB value of exporting good
- VA calculation result
- List of supporting documents
Improving Compliance (cont’d)

3. Seminars on ROO (METI, JETRO and JCCI)
   - All industries: biannual, mainly for new CO officials
     basic idea about EPA/FTA, ROO, certification procedures
   - Individual industries: on request
     lectures vary with specific needs

4. EPA Advisors
   - Provide general information
   - Take specific inquiries
     e.g. application of ROO, examination techniques
   - Troubleshooting
Lessons Learned

Application: good opportunity to review own compliance
- Examination/certification process
  (including organization, human resources)

Clear compliance requirements: make process foreseeable
- Ideas about “what should be done” and “to what extend”
- Guidelines, seminars... : useful way for improvement

Self-Cert system + supports from government

Make exporters more reliable
Thank you.