

GOVERNMENT OF MONTENEGRO

MINISTRY OF FINANCE

REVENUE AND CUSTOMS ADMINISTRATION

Montenegro Time Release Study 2021



Creating Markets, Creating Opportunities

ACKNOWLEDGMENTS

The Revenue and Customs Administration of Montenegro, with the support of the International Finance Corporation (IFC), has successfully undertaken its second Time Release Study according to The World Customs Organization's (WCO) methodology.

We would like to express our gratitude to the IFC Trade Facilitation Support Project Team, led by Violane Konar – Leacy and Ratka Stijepovic, for providing a comprehensive consultancy and technical support in the implementation of the Study, as well as for working jointly with us to ensure better efficacy of the customs procedures and create a better environment for cross border trade.

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1. EXECUTIVE SUMMARY

1.1. STUDY FRAMEWORK

Regular conduct of the Time Release Study (hereinafter: the Study) is an obligation arising from membership in the World Trade Organization and the ratified Trade Facilitation Agreement. Article 7.6. of this Agreement recommends that data on the average time required for the release of goods in cross-border traffic be measured and published periodically.

The first Study was conducted in 2016, from November 19, 2016 to December 15, 2016, at four locations: Podgorica Terminal Customs Office (hereinafter: CO), CO Dobrakovo border crossing point, CO Free Zone Bar and CO Podgorica Airport.

For the purpose of comparability of results, the second Study was conducted in the period from November 20, 2021 to December 30, 2021, at the same locations, for seven consecutive days at each measurement site - from 00:00 to 23:59.

1.2. MAIN MEASUREMENT RESULTS

		2021	2016	Index
ROAD CARGO				
	Procedures at the border crossing point	1 hour 40 minutes	1 hour 57 minutes	-15%
Import	Procedures at the terminal	8 hours 23 minutes	9 hours 8 minutes	-8%
Import – the total time of procedures without inland transit		10 hours 3 minutes	11 hours 5 minutes	-9%
Import · inland tr	- the total time of procedures including ansit	15 hours 32 minutes	16 hours 4 minutes	-3%
	Procedures at the terminal	1 hour 58 minutes	2 hours 1 minute	-2%
Export	Procedures at the border crossing point	14 minutes	28 minutes	-63%
Export – the total time of procedures without inland transit		4 hours 1 minute	5 hours 28 minutes	-27%
Export – the total time of procedures including inland transit		6 hours 13 minutes	8 hours 7 minutes	-23%
AIR CARGO				
Import – This time includes the period taken from the arrival of the aircraft until the physical		1 day 1 hour 45 minutes	1 day 13 hours 29 minutes	-27%

removal of the consignment from the airport warehouse.					
Export – This time includes the period from the receipt of goods for transportation until the moment of loading consignments on the plane.	1 hour 32 minutes	2 hours 8 minutes	-24%		
SEA CARGO					
Transit - from the registration of the incoming manifest (24 hours before arrival of the ship) until the transit declaration is confirmed, .e., until the consignment leaves the customs territory of Montenegro	2 days 9 hours 55 minutes	3 days 14 hours 6 minutes	-33%		
1.3. FINDINGS					

- 1.3.1. The total average release time has been shortened | In all modes of transport and in all measured regimes, a reduction in the total time required for the release of goods was recorded. This reduction is the largest in the transit procedure through the CO Free Zone Bar (33%), then in air transport in the import procedure 27% and in the export procedure 24%. The smallest improvement was recorded in the import procedure in road transport on the route CO border crossing point Dobrakovo CO Podgorica Terminal (3%).
- **1.3.2.** The average time of customs clearance is more significantly affected by the waiting time than the processing time | Although the total average time required for the release of goods has been shortened and the processing time of almost all participants in the procedure has been improved, the measurement results are significantly affected by the waiting time recorded in almost all procedures:
 - The truck waiting time at the Dobrakovo border crossing point conditioned by the design and capacity of the infrastructure and, accordingly, the schedule of working hours of the border inspection services **1 hour**;
 - The waiting time in the procedure of handing over the documentation to the broker after the arrival of the truck at the inland Terminal Podgorica after 2 p.m., i.e. after working hours of the customs service for customs clearance of import consignments **3 hours and 44 minutes**;
 - The waiting time for unloading of cargo to the courier warehouse if the consignment arrives after working hours **5 hours and 14 minutes**;
 - The waiting time for documentary control in the import procedure in air transport due to reduced staff capacity **1 hour**;
 - The waiting time for physical examination in the import procedure in air transport due to reduced staff capacity and working hours **9 hours and 11 minutes**;
 - The waiting time for payment of the customs debt in the procedure of import by air in cases when the customs debt is not secured by a bank guarantee due to the non-existence of a bank branch at the airport **11 hours and 11 minutes**;

- The waiting time for consignments selected for scanning at the port of Bar due to lack of medically fit staff to operate the scanner 21 hours and 19 minutes.
- 1.3.3. Simplified customs procedures bring significant benefits in terms of customs clearance time | Economic operators who have been granted a simplified customs procedure have more significant relief in terms of the time of customs clearance of goods than those who are not part of these procedures. The data show that the time for completion of all Import formalities in road transport in the case of importers who have been granted a simplified customs procedure based on a book entry is 61% shorter than the total average time in the regular procedure. The difference is even greater in the duration of formalities at the terminal, which is 94% shorter for these economic operators compared to the average duration of the regular import customs procedure at the terminal. The situation is similar in the import procedure in air transport, where the average time of customs clearance of goods of the holder of the permit for declaring express consignments in a special procedure is 20% shorter than the total average time required to complete all import formalities in the regular procedure.
- **1.3.4. Private sector performance has improved** | The Study findings show that the business community has significantly improved its logistics potential and improved the average processing time in almost all measured aspects. All actors involved in the release of goods have improved their results, both in terms of duration and percentage share.
- **1.3.5.** There is potential for further improvement | There is potential for additional time and cost savings in some of the existing border procedures. However, realizing these potential improvements requires internal political will, a strategic approach and synchronized collective action by all public and private sector actors involved.

1.4. **RECOMMENDATIONS**

SHORT-TERM RECOMMENDATIONS	
Fully implement measures to	Extend the application of the simplified customs procedure based on book entries to a larger number of economic operators.
minimize time, costs and documentation in cross-border trade processes	Enable the issuance of approvals for the application of the simplified customs procedure on the basis of book entries to brokers, with the obligation to attach a list of economic operators to be represented in the domestic customs procedure (in the first

phase of implementation this number may be limited to 5-10 economic operators).
Strengthen the capacity of the Revenue and Customs Administration to implement the procedure for issuing approvals for simplified customs procedures based on book entries in a shorter period of time.
Improve the Customs Information System (CIS) to enable the electronic submission and processing of summary declarations
Enhance the CIS to fully support the declaration of express consignments in a special procedure
Provide the possibility of declaring express consignments in a special procedure to all eligible express mail operators.
Provide an additional set of benefits for authorized economic operators, in accordance with legal options and EU standards, primarily in terms of bank guarantees. Reducing costs can be a significant benefit that would enable the extension of the application of the status of authorized economic operator.
Provide simplified application of the "abbreviated" procedure of release of goods for free circulation at the border crossing point based on product tariff number, design and capacity, i.e. category of each individual border crossing point, not limiting the time and economic operators to which this procedure is available.
Ensure that resource allocation and reallocation are determined based on structure, organization, workload and operational priorities, which are subject to regular and systematic evaluation.
Analyze the formalities and documentation used in the import, export and transit procedure in order to reduce the number of documents, time and costs of regulatory compliance.
Make regular and updated information available to the business community (e.g. circulars, notices, publications, etc.) on the application of customs regulations, procedures, prohibitions and restrictions, etc.
Evaluate the Trade Facilitation Strategy 2018-2022 in order to determine the level of implementation and the effects of planned and implemented activities.

	Strengthen the capacity of the National Trade Facilitation Committee to ensure the continuation of the reform agenda.			
MEDIUM-TERM RECOMMENDATIONS				
Develop the security of the international supply chain	Conduct a comprehensive evaluation of the effectiveness of border controls by all border services.			
through a balanced approach between security measures and the facilitation of international trade	Ensure that risk indicators are continuously revised based on feedback from conducted controls and the results of investigative activities.			
	Further strengthen and expand the application of post clearance audits to ensure compliance with customs and other relevant and related laws and regulations in order to speed up customs clearance of goods.			
Improve and maintain existing infrastructure and modern equipment that supports business strategies of border	Prepare a legal, institutional and IT framework for introduction of automated import and export systems and customs decision management systems, including business process modeling and strategic IT documents.			
authorities and improves business performance by applying IT technology	Improve the customs information system to support all business processes in the Port of Bar free zone operation.			
app.,	Develop an information system to support border veterinary and phytosanitary inspectors and food safety inspectors, and enable electronic submission of documentation for import, export and transit of goods.			
	Develop an IT system of inspection services for the application of risk analysis and management.			
	Prepare a roadmap and start implementing a single one-stop shop system to perform all import, export and transit formalities in one place.			
	Make a plan for upgrading and reconstruction of existing border capacities with significant participation in foreign trade, taking into account the expectations of stakeholders, share in foreign trade and frequency, necessary working conditions and other relevant factors.			
Upgrade existing initiatives for inter-ministerial and	Improve the system and increase the percentage of joint and coordinated controls between customs and other agencies in order to optimize expertise and reduce customs clearance time.			

international coordination of border services	Provide a strategic approach in the implementation of the concept of shared border crossing points, which will imply joint action of all border services, where possible.
POLICY CONSIDERATIONS	
Develop a modern, service- oriented customs administration in accordance with international standards and national requirements	Adopt a business strategy and business change management plan of the Revenue and Customs Administration that will include objectives, concrete measures, indicators of progress and critical success factors.
	Develop human resource management policies in line with national legislation and international standards that will include, inter alia, indicators of effectiveness and performance measurement.
Provide conditions for further improvement of the food safety management system	Consider developing a capacity-building plan for border inspection services, which will include short-term and long-term needs, taking into account stakeholder expectations, staff resources, working conditions, new technologies, facilities, supply chain management objectives and other relevant factors.
Implement and upgrade existing initiatives to facilitate the cross-border flow of goods among CEFTA economies	Evaluate the implementation of existing regional agreements on cooperation and mutual recognition in order to determine the level of implementation and the effects of planned and implemented activities. Identify new areas of cooperation.
	Further improve the competitiveness of the national logistics sector through a comprehensive regional approach to logistics and analysis of existing sector performance using reference tools such as the World Bank Group Logistics Performance Index, the World Economic Forum Global Logistics Performance Index and the Market Development Logistics Index.
	Consider the participation of the logistics sector within CEFTA structures.

1. INTRODUCTION

1.1. BASIC INF	ORMATION
BACKGROUND	In 2021, with the support of the International Finance Corporation - a member of the World Bank Group, Montenegro Customs Administration conducted their second Time Release Study (TRS) in accordance with the TRS methodology of the World Customs Organization (WCO), whose software was used to enter and process the collected data. The TRS conducted in Montenegro measured the average time required for
	import, export and transit of goods, taking into account the total time required to complete all formalities. In addition, the Study separately measured the average time of all stakeholders, both public and private, involved in the customs clearance procedure.
	In addition to measuring the time of customs clearance of goods, the TRS includes recommendations for improving efficiency and lays the foundation that allows future decisions to be well designed and implemented.
	The purpose of the desired results and conclusions of this Study is to determine the reference time required for the implementation of customs procedure at the border crossing points and to identify potential barriers to cross-border trade in order to propose corrective measures in areas where efficiency needs to be improved.
MEASUREMENT ORGANIZATION	Time measurement is prepared, organized and conducted by the Revenue and Customs Administration, in cooperation with the National Trade Facilitation Committee, through the Working Group for Time Measurement and operational teams at selected customs offices and other locations for time measurement.
	The Working Group includes representatives of all competent authorities, the private sector and other participants in the supply chain. Operators of ports, airports and terminals where measurements are performed also participate in the work of the Working Group. The Working Group is tasked to develop a unique and comparable methodology for time measurement, define the scope, methods and instruments of measurement, define the content of the questionnaire, manage and coordinate the entire process of the TRS preparation and implementation, prepare the first measurement results and a time measurement report.
	Operational teams include representatives of all competent authorities and other participants in the time measurement process at selected customs offices and other locations where time measurement is carried out.

	Operational teams manage the preparation, organization and implementation of time measurement at their respective measurement locations and are responsible for taking the necessary actions in a timely manner in order to efficiently perform time measurement.				
METHODOLOGY	The methodology developed by the World Customs Organization was used In all phases of the TRS preparation and implementation, which is a globally accepted methodology for measuring the actual time required for the release and/or customs clearance of goods. This methodology is presented in the new version of the "Guide to Measure the Time Required for the Release of Goods (Version 3)". In the first phase, this methodology is adjusted to national requirements,				
CEOCRAPHICAL	within its allowed flexibil				
GEOGRAPHICAL SCOPE	Customs office at the border crossing point Dobrakovo Customs office Terminal Podgorica Customs office Free Zone Bar Customs office Podgorica Airport				
MODE OF TRANSPORT AND CUSTOMS REGIME	Road cargo	Import - from the arrival of the consignment at the border crossing point to its departure from the inlan Customs Terminal Podgorica upon completion of a procedures and release of goods for free circulation			
		Export - from the moment a truck entered the Customs Terminal Podgorica until the completion of police control at the border crossing point Dobrakovo and its departure from the customs territory of Montenegro.			
	Air cargo	Import - from the moment an aircraft landed at the airport until the consignment departs from the airport warehouse.			
		Export - from the moment the goods are received for transport by the airport cargo service until the consignment departs from the warehouse to the aircraft			
	Sea cargo	Transit – the time from the registration of the incoming manifest by customs, which is usually 24 hours before arrival of the ship, until the transit			

		l the consignment ontenegro					
	Air transport	From Novem	From November 20 to November 27, 2021				
PERIOD	Road transport	From Novem	ber 28 to December	to December 4, 2021			
	Sea transport	Sea transport from December 23 to December 30, 2021					
MEASUREMENT PERIOD	Seven consecutive da	ays at each measur	ement site - from oo	:00 until 23:59.			
TYPE OF CARGO	Commercial goods of specified.	leclared in the sin	gle entry document	during the period			
INSTRUMENT AND METHODS OF MEASUREMENT	The time measurement was carried out on the basis of a correctly filled in questionnaire defined for each individual mode of transport, customs procedure and action within that procedure, which were the subject matter of time measurement.						
The questionnaire accompanied the consignment during the entire procedure for which the time measurement was carried out. The questionnaire was taken over at the end of the procedure by the co authority or participants in the time measurement procedure, who fil time in the box indicated in the questionnaire. Exceptionally, electronic data from the Port of Adria information sys used to measure the time of submission of goods in sea transport.							
	Validation of data related to the customs procedure was carried out on the basis of electronic data from the customs information system for operations for which data were recorded electronically.						
		Import	Export	Transit			
NUMBER OF	Road transport	323	76	X			
QUESTIONNAIRES	Air transport	118	82	X			
	Sea transport X X 68						
LIMITATIONS Scope Limitations Scope Limitations It is recommended that the Study be carried out during periods of normal traffic. The measurement time was impacted by the large number of holiday's days are impossibility to perform the measurement earlier, and the selected time period is considered as period of low the moderate volume of trade.							

	In addition, the Study is a brief overview of individual trade routes and is not a fully comprehensive study of all trade corridors.
Data limitations	The study covers both manual and automated procedures. Given that a large number of clearance procedures are conducted manually, except by Customs and the port terminal operator, who are fully automated, the accuracy, reliability, and completeness of the data depended on the good will of all involved stakeholders.

1.2. DEVELOPMENT OF THE STUDY

As recommended by the World Customs Organization, the Study was developed in three phases, during the period from September 2021 to April 2022.

Table 1 shows the time course of the implementation of the most important activities within each phase of the Study of the average time of release of goods.

Table 1 Time frame for developing the Study

	Sep 2021	Oct 2021	Nov 2021	Dec 2021	Jan 2022	Feb 2022	Mar 2022	Apr 2022
STUDY PREPARATION								
Establishment of the study-working group								
Framework definition								
Questionnaire design								
Pilot								
COLLECTION AND RECO	ORDING	OF DATA					•	
Data collection								
Data verification								
Data entry into the software								
DATA ANALYSIS AND CO	ONCLUS	IONS	-					
Preliminary analysis								

Presentation of results					
Preparation of reports					

PREPARATION OF THE STUDY

September – November 2021

This phase involved the establishment of the study-working group consisting of representatives from all stakeholders involved in the study and reaching a consensus on the basic elements of the Study: (1) the scope of the study; (ii) duration and time of the study; (iii) the structure and the content of the questionnaire to be used for data collection.

This phase included the establishment of a working group to prepare the Study, composed of representatives of all stakeholders involved in the measurement and reaching consensus on the basic elements of the study: (i) the scope of the measurement; (ii) duration and timing of measurements; (iii) the structure and content of the questionnaire to be used for data collection.

Several workshops were held to disseminate information among stakeholders and brainstorm the required information to be included in the questionnaire. The Working Group provided training to stakeholders from the public and private sector stakeholders involved in the release process, and prepared the guidelines and instructions for the completion of the study questionnaires.

Once the methodology (including the content of the questionnaire) was completed, personnel of the institutions involved in the measurement were assigned to collect and record the data.

In order to adequately prepare, the test measurement was carried out on 11 November 2021 at the Customs Office Podgorica Airport, on 18 November 2021 at the border crossing point Dobrakovo and Inland Terminal Podgorica, and on 20 December 2016 at the Customs Office Free Zone Bar.

Data obtained during the test helped to revise the final questionnaires and align them with the specifics of e measurement site, after which the final versions were entered into the WCO software.

TIME MEASUREMENT

November – December 2021

The collection and recording of data captured import, export and transit procedures in road, sea and air transport carried out by relevant authorities and stakeholders during the measurement periods. Each questionnaire was attached to the Customs Declaration selected for the Study to gather information from point of arrival of the goods at the border until final release of goods from Customs control (import), i.e. leaving the customs territory of Montenegro (export, transit).

Upon completion of the measurements, data were collected and, based on available databases and field experiences, verification of their accuracy was initiated. Verification resulted in the rejection of questionnaires containing inaccurate and/or inconsistent data.

After verification, data was entered into the World Customs Organization software. The relevant software was also used to carry out data analysis and prepare a report on the average time of goods clearance based on data obtained from the questionnaire.

DATA ANALYSIS

January – April 2022

Interim results were presented at a number of forums and feedback sought on their clarity and relevance.

A series of structured interviews with a small selection of importers and service providers were also conducted to further test and validate the results, and to identify the circumstances that affected the duration of their actions under the measured customs regimes. Comments and explanations of the results obtained from the participants in the procedure are to be included in the final report.

The results were analyzed in order to determine and make comparisons with the times achieved during the 2016 Study.

2. STUDY FINDINGS

2.1. ROAD CARGO IMPORT

Road traffic was measured on the route from the border crossing point of Dobrakovo to the inland terminal of Podgorica. The reason for this decision is the fact that this route makes up approximately **60%** of the total cross-border traffic of Montenegro.

In the import procedure, the measurement covered the time from the arrival of the consignment at the border crossing point to the departure from the inland customs terminal of Podgorica upon completion of all procedures and release of goods for free circulation.

The average release time for imported consignments from the border crossing point of Dobrakovo, which are cleared exclusively at CO Terminal Podgorica or at the premises of the authorized consignee (belonging to CO Terminal Podgorica) and which entered the country through that border crossing point, was measured.

The data obtained show that the average release time of goods imported through the border crossing point of Dobrakovo and released for free circulation at the terminal Podgorica is **15 hours** and **32 minutes**, **35% (5 hours and 29 minutes)** of which is the time required for inland transit from the border crossing point to the inland terminal.

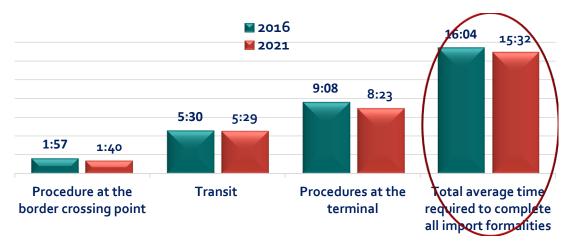


Chart 1 Comparative average time of import formalities on the measured route in 2016 and 2021.

Compared to the data from the first Study conducted in 2016, the total time required to complete all import formalities on the measured route **(16 hours 4 minutes) is 3% shorter**. The duration of formalities at the border crossing point is shorter by **15%** while the duration of procedures at the terminal is shorter by **8%**.

The duration and percentage share of individual activities in the total duration of imports are given in Table 2.

Table 2 Comparative overview of the duration and percentage share of individual formalities in the total	
import time on the measured route	

	20	16	20	021
	Duration	% in total time	Duration	% in total time
PROCEDURES AT THE BORDER	1 h 57 min	12%	1 h 40 min	10.7%
Waiting time at the BCP	1h 5min	6.8%	57 min	6.1%
Transfer of documents	8 min	0.8%	7 min	0.8%
Radiological examination	5 min	0.5%	5 min	0.5%
Control by border police	2 min	0.2%	2 min	0.2%
Control by inspection authorities	13 min	1.3%	13 min	1.4%
Submission of SAD and documents	13 min	1.3%	7 min	o.8%
Inspection of documents and goods	11 min	1.1.%	9 min	1%
TRANSIT	5h 30 min	34.2%	5 h 29 min	35 .3%
PROCEDURES AT THE TERMINAL	9 h 8 min	53.8%	8h 23 min	54%
Handover of documents	3h 50 min	23.9%	3h 49 min	24.6%
Transit confirmation	23 min	2.4%	19 min	2%
Sanitary inspection	48 min	5%	1h 7m	7.2%
Radiological examination	22 min	2.3%	22 min	2.3%
Submission of SAD and documents	27 min	2.8%	21 min	2.2%

	16 hours 4 minutes	100%	15 hours 32 minutes	100%
Leaving the terminal	1h 21min	8.4%	1 h 20 min	8.6%
Inspection of documents and goods	1h 25min	9%	1 h 05 min	7%

PROCEDURES AT THE BORDER CROSSING POINT

In the analyzed period, it took an average of **1** hour and **40** minutes to complete all formalities at the border crossing point, which is **11.5%** of the total import time on the measured route.

Table 3 Comparative overview of the duration and percentage share of border formalities in the total import time on the measured route

	2016		20	021	
	Duration	% in total time	Duration	% in total time	Index of change
Waiting time at the BCP	1h 5min	55.6%	57 min	57%	-12%
Transfer of documents	8 min	6.8%	7 min	7%	-13%
Radiological examination	5 min	4.3%	5 min	5%	0%
Control by border police	2 min	1.7%	2 min	2%	0%
Control by inspection authorities	13 min	11.1%	13 min	17%	٥%
Submission of SAD and documents	13 min	11.1%	7 min	7%	-46%
Inspection of documents and goods	11 min	9.4%	9 min	9%	-18%
	1 hour 57 minutes	100%	1 hour 40 minutes	100%	-15%

In the total duration of the procedure at the border crossing point, the longest waiting time for trucks was at the border. In the measured period, it lasted on average 57 minutes, which is 57% of the total time spent on border formalities and 6% of the total time required to complete all import procedures on the analyzed route. The waiting time was significantly longer for goods that were subject to veterinary or phytosanitary inspection. In this case, due

to infrastructural issues that do not allow organizing the work of inspection services in the evening, the waiting time averaged **3 hours and 6 minutes**, that is **2 hours and 11 minutes** in the case of veterinary inspection and **3 hours and 37 minutes** in the case phytosanitary inspections;

 At the BCP, goods traded by regular traders would be assigned to transit control and proceed to the inland terminal for full clearance. Those traders who enjoy the benefits of the "abbreviated clearance" procedure¹ would be able to do full clearance for free circulation for their goods at the BCP. Goods of the traders who are part of the new "simplified procedure" scheme would go through transit control process, as their clearance for free circulation would be done at the trader's warehouse." The average duration of these processes at the border is given in the table.

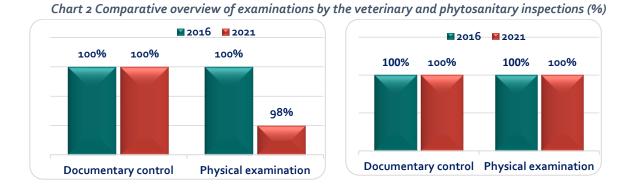
	2016	2021
Average border time	1 h 57 min	1 h 40 min
Goods assigned to transit control from the moment of arriving to the border till exiting	1 h 40 min	1 h 24 min
Goods assigned to transit control and simplified process ² from the moment of arriving to the border till exiting	1 h 40 min	1 h 22 min
Goods cleared under abbreviated procedure at the border, from moment of arrival to border till they exit for free circulation	1 h 37 min	2 h 4 min ³

¹ This is a procedure that gives a trader a benefit of clearing the goods at the BCP without needing to go to the inland terminal. This procedure existed prior to the project start and was also described in the 2016 TRS as "simplified process". Please note that 2016 process described in the 2016 TRS as "simplified process" is NOT the same as a new "simplified procedure" supported by the ECA TFSP project and rolled out as of 2017. It would have been more correct to refer to the old process In 2016 TRS as new "simplified process" supported by the ECA TFSP project and rolled out as of 2017. It would have been more correct to refer to the old process In 2016 TRS as new "simplified process" supported by the project. Please also note, that Authorized Economic Operators (AEO) program is one more initiative that has been piloted with the ECA TFSP project. In order to gain the AEO status, a company first needs to receive access to the new "simplified process". Additional benefits of joining the AEO program would include mutual recognition in other Balkan countries by which these customs administrations agree to recognise the AEO authorisation issued in other countries and provide reciprocal trade facilitation measures to AEOs of the other country.

² As these goods will be cleared in trader's warehouse, at the BCP they go through the same customs transit control process as other transiting goods

³ This measurement includes an outlier shipment, customs clearance of which took 14 hours. Namely, the shipment, which was the subject of phytosanitary control, arrived at the BCP on December 3 at 6:31 p.m. In winter conditions at that time, is not possible to inspect the shipment (due to lighting), so the phyto inspection of that shipment was performed on Dec. 4. at 8.17 am. The same shipment was also physically inspected by customs. The shipment was cleared on Dec. 4. at 8.52. am. If this outlier shipment is removed from the 2021 data, the time of goods cleared under "abbreviated clearance" procedure in 2021 would be 1h 32 min.

- Of the total number of consignments covered by the measurement, **40%** were released for **free circulation at the border crossing point ("abbreviated customs clearance")**. Compared to the measurement from 2016, the number of shipments cleared at the border in the so-called abbreviated procedure decreased by 4.3% due to the fact that the procedure for obtaining this type of authorization has become more complex and implies that each company must submit an application for the same type of goods to the customs office, pay an administrative fee and submit a copy of the bank guarantee every month;
- Of the total number of consignments covered by the measurement, **7%** were those granted a **simplified procedure based on the book entry,** implemented through the IFC Trade Facilitation Support Program. Under this procedure the goods may go directly to or from the premises of economic operators. These operators trusted traders benefit from a low rate of physical inspections and examinations, rapid release times and the ability to use electronic documents (a single document submitted electronically instead of six paper documents physically submitted to customs).
- The time required to perform a **veterinary or phytosanitary inspection** of consignments is **13 minutes** in the total time, and does not affect the total time of import formalities. During this measurement period, in the case of both inspections, there was an increase in the percentage of physical examinations compared to the measurement conducted in 2016. **The percentage of physical examinations** by **the veterinary inspection** increased from **87% to 98%**, while the same type of examination by the **phytosanitary inspection increased from 50% to 100%**;



The private sector's share in the total time at the border crossing point is 14%, of which 7% is related to the time required for the freight forwarder to collect documents from the driver upon his arrival at the border crossing point (7 minutes), and 7% is related to the time required for the transit declaration submission and registration in the customs information system (7 minutes). Comparative results show an improvement in the efficiency of the private sector compared to the previous measurement and a reduction of their time in the total duration of border import formalities from 21 minutes to 14 minutes, or 33%;

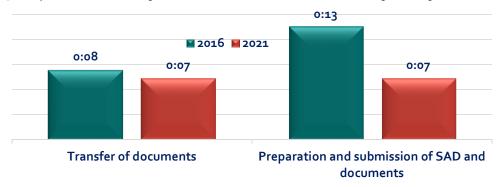


Chart 3 Comparative overview of the brokers' share in the total duration of border formations

• The average time to complete the **customs procedure** at the border crossing point is **9 minutes**, which is an improvement of **18%** compared to the time measured in 2016, when the customs procedure lasted on average **11** minutes. In relation to the measurement from 2016, a change in practice was recorded, which meant that customs officers opened every truck. The change is due to the customs administration's focus on implementing a functional risk management system that provides identification and targeting of high-risk consignments, in order to ensure an adequate balance between trade facilitation and protection of public interests. This resulted in the abandonment of the system of nonselective opening of each truck and the introduction of targeted **physical examinations**, which were conducted in **16%** of cases;

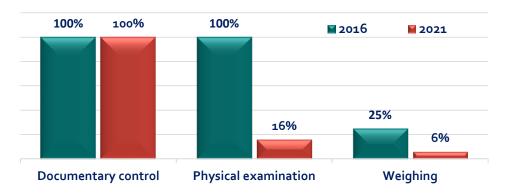


Chart 4 Comparative overview of controls by the customs authority (%)

• Although the practice of performing **joint controls** has not yet been implemented to a significant extent, they are still carried out on an ad hoc basis. In the measured period, joint controls were carried out in **3%** of cases, by customs and phytosanitary inspection.

The transport time from the border crossing point of Dobrakovo to the inland customs terminal in Podgorica (inland transit) lasted on average **5 hours and 29 minutes** in the measured period, which is **35%** of the time required to import goods on the analyzed route.

PROCEDURES AT THE TERMINAL

In the analyzed period, the procedures at the terminal lasted **8 hours and 23 minutes**, which is **54%** of the total duration of imports on the measured route.

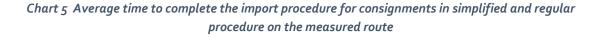
The greatest improvement was achieved in the procedure of submitting declarations and documents to the customs authorities by the freight forwarders, which was shortened by 22%, and in the procedure of examining documents and goods by the customs authorities, which was shortened by 24%. The shortening of the average time taken by the customs authorities to complete their work was influenced by the time taken to conduct customs procedures at the premises of economic operators that were granted simplification based on the book entry.

Duration and percentage share of individual activities in the total duration of procedures at the terminal are given in Table 4.

	2016		20	021	
	Duration	% in total time	Duration	% in total time	Index of change
Handover of documents	3h 50 min	44.5%	3h 49 min	45.5%	٥%
Transit confirmation	23 min	4.4%	19 min	3.8%	-17%
Sanitary inspection	48 min	9.3%	1h 7m	13.3%	+40%
Radiological examination	22 min	4.3%	22 min	4.4%	٥%
Submission of SAD and documents	27 min	5.2%	21 min	4.2%	-22%
Inspection of documents and goods	1h 25min	16.6%	1 h o5 min	12.9%	-24%
Leaving the terminal	1h 21min	15.7%	1 h 20 min	15.9%	-1%
	9 hours 8 minutes	100%	8 hours 23 minutes	100%	-8%

Table 4 Comparative overview of the duration and percentage share of activities at the terminal in the total duration of formalities at the terminal in the import procedure

- In the total time of the procedure at the inland terminal, the procedure for the delivery of documents to the freight forwarder by the driver took the longest 3 hours and 49 minutes, which is 45% of the time required to complete the formalities at the terminal and 25% of the time required to complete all import formalities. The total time of this procedure was influenced by the fact that the customs clearance of goods at the terminal after that time, the delivery of documents can take place only on the following day.
- The total number of measured consignments included 7% of those granted a simplified procedure based on the book entry. The total time required to complete all import formalities (from arrival at the border crossing point to the end of the customs procedure) for the holders of this authorization was on average 6 hours and 2 minutes, which is 61% shorter than the time required to complete these procedures in regular import procedure. In addition, from the moment of arrival at the premises of the authorized consignee, these consignments are cleared through customs in an average time of 32 minutes (measured from arrival at the premises of the authorized consignee, these procedure), which is 94% shorter than the time required for the customs clearance of consignments in the regular import procedure;





Total average time required to complete Average release time of goods at the all import formalities terminal

- The customs implemented electronic **transit confirmations**, which resulted in a **17% reduction** in the average time required to complete this procedure (from 23 minutes to 19 minutes). Compared to the Study conducted in 2016, the **percentage of physical examinations** in the transit confirmation procedure was reduced from **32% to 10%**;
- An increase in the percentage of physical examinations by the sanitary inspection was recorded from 17.5% during the 2016 measurement to 88% during the 2021 measurement. This also affected the average duration of this procedure, which was increased by 40%;

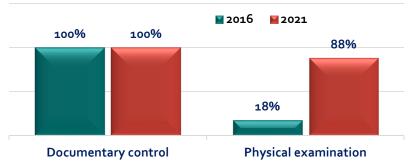
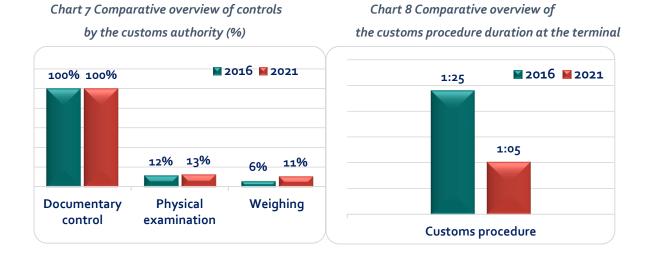


Chart 6 Percentage of examinations by sanitary inspection

- The time required to prepare the documents and submit them to the customs authority by the freight forwarder averaged **21 minutes and was reduced by 22%** compared to the previous measurement;
- The duration of the customs procedure at the terminal was **reduced by 24%**. At the same time, the customs procedure recorded an **increase** in the percentage of **physical examinations** (from 12% to 13%) and weighing of consignments (from 6% to 11%) compared to the previous measurement;



2.2. ROAD CARGO EXPORT

In the export procedure, road traffic was measured on the route from the inland terminal of Podgorica to the border crossing point of Dobrakovo. The measurement covered the time period from the moment a truck entered the customs terminal of Podgorica until the completion of police control at the border crossing point and its departure from the customs territory of Montenegro.

The average release time for export consignments sent from CO Terminal Podgorica to the border crossing point of Dobrakovo was measured, as well as export consignments sent by a holder of the authorization for simplified export procedures from an approved site, which belong to CO Terminal Podgorica and are exported exclusively through the mentioned border crossing point.

The results show that the export process takes an average of **6 hours and 13 minutes**, of which an average of **4 hours (65%)** refers to domestic transport from the terminal to the border crossing point. Procedures at the Podgorica customs terminal lasted an average of **one hour and 58 minutes** in the measured period, while it took **14 minutes** to complete all procedures at the border crossing point of Dobrakovo.

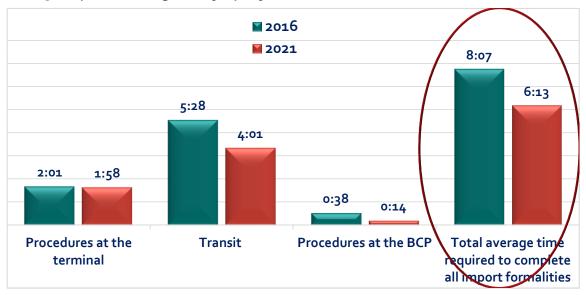


Chart 9 Comparative average time of export formalities on the measured route in 2016 and 2021.

Based on comparative analysis, compared to the measurement conducted in 2016 when it took an average of **8 hours and 7** minutes to complete all export formalities, the total time **improved by 23%**, with the greatest time savings achieved during inland transit and the duration of procedures at the border crossing point as a result of reduced traffic.

Table 5 shows the duration and percentage share of individual activities in the total duration of exports of goods from the Podgorica terminal through the border crossing point of Dobrakovo.

Table 5 Comparative overview of the duration and percentage share of activities in the total export time on the measured route

	20	16	20	021
	Duration	% in total time	Duration	% in total time
PROCEDURES AT THE TERMINAL	2 h 1m	25%	1h 58min	31.6%
Arrival of a truck at the terminal and delivery of documents	17 min	3.5%	25 min	21%
Preparation and delivery of documents	29 min	24%	18 min	15%
Examination by the customs authority	48 min	40%	45 min	38%
Shipping of goods	27 min	22%	30 min	25.5%
TRANSIT	5h 28 min	68%	4 h 1 min	64.6%
PROCEDURES AT THE BCP	38 min	7%	14 min	3.8%
Waiting time at the BCP	28 min	74%	5 min	36%
Examination by the customs authority	7 min	18%	6.5 min	46%
Control by the border police	3 min	8%	2.5 min	18%
	8 hours 7 minutes	100%	6 hours 13 minutes	100%

PROCEDURES AT THE TERMINAL

In the analyzed period, it took **1** hour and **58** minutes on average to complete all formalities at the customs terminal, which is **32%** of the total import time on the measured route.

Table 6 Comparative overview of the duration and percentage share of formalities at the terminal in the total export time on the measured route

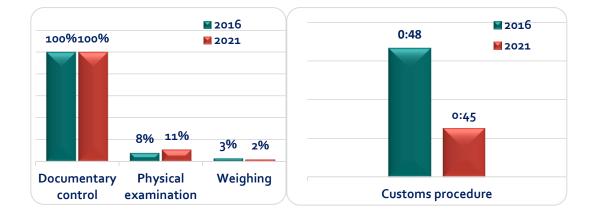
	2016		20		
	Duration	% in total time	Duration	% in total time	Index of change
Arrival of a truck at the terminal and	17 min	14%	25 min	21.2%	+47%

Shipping of goods	27 min 2 hours 1 minute	22%	30 min 1 hour 58 minute	25.4%	+11% -2%
Examination by the customs authority	48 min	40%	45 min	38.1%	-6%
documents Preparation and delivery of documents	29 min	24%	18 min	15.3%	-38%
delivery of					

- The average time in which a broker submits an electronic declaration, prepares documentation and physically submits it to the customs authority was **18 minutes and was reduced by 38%** compared to the previous measurement;
- The average duration of the customs procedure at the terminal was reduced by 6% compared to the previous measurement, and the percentage of weighing was also reduced from 3% to 2% (the weighing procedure lasted on average 16 minutes). At the same time, the percentage of physical examinations increased from 8% to 11% and the examination itself lasted an average of 44 minutes, counting from the moment of notifying the broker about the referral for a physical examination. The records show that the physical examination was initiated in all cases when it was necessary to submit additional documentation.

Chart 9 Comparative overview of examinations by the customs authority (%)

Chart 10 Comparative overview of the customs procedure duration at the terminal



TRANSIT

The time of transport from the inland customs terminal Podgorica to the Dobrakovo border crossing point (inland transit) averaged **4 hours and 1 minute** during the measured period, accounting for **65%** of the time needed to export the goods on the analyzed route. Compared to the previous

measurement, when the inland transit lasted 5 hours and 28 minutes, the time of transport was reduced by **27%**.

PROCEDURES AT THE BORDER CROSSING POINT

In the analyzed period, it took 14 minutes **to complete all export formalities at the Dobrakovo border crossing point**, and on average it accounted for **32%** of the total import time on the measured route. Compared to the previous measurement when border export procedures lasted on average 38 minutes, the total average export time at the border is **63% shorter**.

Table 7 Comparative overview of the duration and percentage share of border formalities in the total import time on the measured route

	2016		20		
	Duration	% in total time	Duration	% in total time	Index of change
Waiting time at the BCP	28 min	74%	5 min	36%	-82%
Examination by the customs authority	7 min	18%	6.5 min	46%	-12%
Control by the border police	3 min	8%	2.5 min	18%	-17%
	38 minutes	100%	14 minutes	100%	-63%

- Concerning the formalities at the border crossing point, the waiting time at the BCP was reduced in the analyzed period and averaged **5 minutes**, as a result of reduced traffic;
- There was no physical examination of consignments at the border crossing point.

2.3. AIR CARGO IMPORT

Based on data obtained in the measured period, the import of goods by air takes **1 day**, **1 hour and 25 minutes** on average. This time includes the period taken from the arrival of the aircraft at the airport until the removal of the consignment from the airport warehouse. This time is **27% shorter** than the total average time of import of goods by air measured in 2016, when the same process lasted **1 day**, **13 hours and 29 minutes**.

Chart 11 Duration and percentage share of individual activities in the total duration of the procedure for import of goods by air from the airport of Podgorica

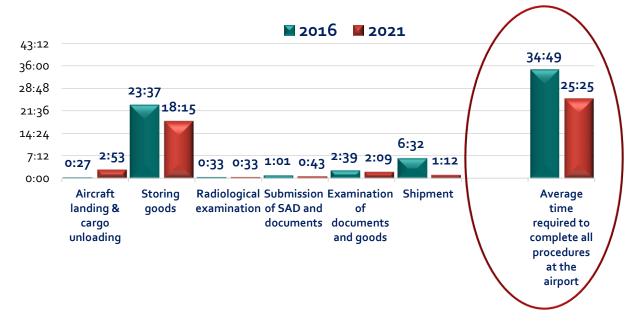


Table 8 shows the duration and percentage share of individual activities in the total duration of the procedure of importing goods by air at the airport in Podgorica.

	2016		202		
	Duration	% in total time	Duration	% in total time	Index of change
Aircraft landing & cargo unloading	27 min	1.3%	2 h 53 min	10%	467%
Storing goods	23 h 37 min	67.8%	18 h 15 min	72%	-23%
Radiological examination	33 min	1.6%	33 min	2%	٥%
Submission of SAD and documents	15 1M	2.9%	43 min	3%	-30%

Table 8 Duration and percentage share of individual activities in the total duration of importing goods by air

Inspection documents goods	of and	2h 39 min	7.6%	2 h 9 min	8%	-19%
Shipment		6h 32min	18.8%	1 h 12 min	5%	-82%
		34 hours 49 minutes	100%	25 hours 25 minutes	100%	-27%

- Aircraft landing and cargo unloading by the airport service takes an average of **22 minutes**. The increase in average time was influenced by DHL consignments that arrived in the late night or early morning hours, in which case the unloading of cargo was done from o6:00, when the working hours of this courier service begin. The average time from the arrival of DHL consignments to the start of unloading was **5 hours and 14 minutes** in the measured period, while the unloading of cargo by DHL took an average of **24 minutes**;
- Storing goods accounts for 72% of the total time required to import goods by air. This procedure includes several activities: placing the goods in the warehouse, deconsolidation of the consignment; preparation and processing of the summary declaration; notification of the recipient of the arrival of the goods; and transfer of documents by the broker. The total duration of this procedure is predominantly affected by the fact that the import of goods by air makes up only 2.5% of the total import of goods, in accordance with which the work of public and private actors at the airport is organized. Namely, the goods warehouse of Podgorica Airport is open for the reception of consignments from 7 a.m. to 10 p.m., i.e. during the time in which the reception and dispatch of aircrafts are organized. The customs office of Podgorica Airport is open every working day and on Saturdays from 7 a.m. to 10 p.m., during which time export and warehousing procedures can be carried out. Import procedures can be carried out at Podgorica Airport on weekdays from 7 a.m. to 3 p.m., provided that an e-mail to obtain the registration number of the declaration, which means that the processing of the declaration will begin on the same day, is sent no later than until 2:30 p.m. Customs clearance procedure for goods arriving after that time can begin on the next working day. The work of inspection services, which are not physically located at the airport, is organized in the same way, as well as the work of brokers.

Table 9 Comparative overview of individual formalities in the total duration of the warehousing procedure

	2016		2021			
	Duration	% in total time	Duration	% in total time	Index of change	
WAREHOUSING						
Weighing (for express mail)	n/a		12 min	1.1%		
Storage of goods in warehouse	1h 55 min	8.1%	1h 1 min	5.6%	-47%	
Preparation of documentation for the declaration of goods	10 h 47 min	45.6%	2 h 41 min	14.7%	-75%	
Delivery of goods	1 h 53 min	8%	1 h 11 min	6.5%	-37%	
Examination of summary declaration	42 min	3%	37 min	3.3%	-12%	
Recipient notifications of arrival of goods	2h 42 min	11.4%	7 h 38 min	41.8%	+183%	
Collection of documents by the broker	5h 38 min	23.9&	4 h 55 min	27 %	-13%	
	23 hours 37 minutes	100%	18 hours 15 minutes	100%	-23%	

• In the process of storage of goods, the highest **improvement of 75%** was achieved in the **preparation of documents for the declaration of goods**, which includes consignment deconsolidation and preparation of a summary declaration. The reduction in the average time was the result of declaring express consignments in a special procedure that was granted only to DHL, but not to other couriers. Based on this approval, DHL announces their arrival before the arrival of the consignment to the customs authority by submitting a manifest via electronic data interchange. The manifest replaces the summary declaration, i.e. the incoming security summary declaration. In this way, DHL completes the procedure in **1 hour and 11 minutes**, while other operators in the regular procedure need an average of **5 hours and 19 minutes**. This also affects the total average time required to complete the import formalities in air

transport, which in the regular procedure is **1 day**, **1 hour and 25 minutes and in the simplified** procedure 20 hours and 48 minutes, or 18% shorter;

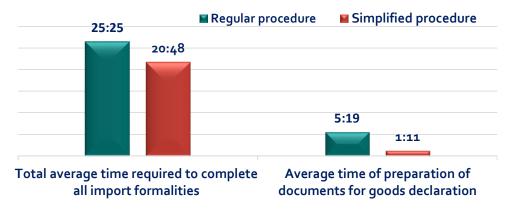
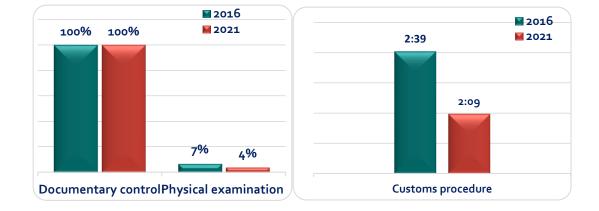


Chart 12 Average time to complete the import procedure in air transport in a simplified and regular procedure

- The increased number of consignments during Friday and weekends caused an increase in the average time in which the consignee is notified of the arrival of goods from 2 hours 42 minutes to 7 hours and 38 minutes (an increase of 183%). An additional reason is the organization of work, which means that the notification is made after all individual consignments from the collective declaration are submitted to the customs authority, and if the collective declaration is processed after 8 p.m., the notification is done the next day.
- The efficiency of brokers improved in terms of the time required to submit declarations and other documents accompanying a consignment, which was **reduced by 30%** (from 61 minutes to 43 minutes);
- **Customs improved** the total average time of inspection of documents and goods by **13%** and reduced the percentage of physical examinations from 7% to 4%. The average time of inspection of documents and goods by the customs authority during the measurement in 2016 was 2 hours and 39 minutes, while the same operation during the measurement in 2021 lasted on average 2 hours and 9 minutes. The average time of the documentary control was 5 minutes and the physical examination time was 8 minutes.

Chart 13 Comparative overview of examinations by the customs authority (%)

Chart 14 Comparative overview of the duration of the customs procedure



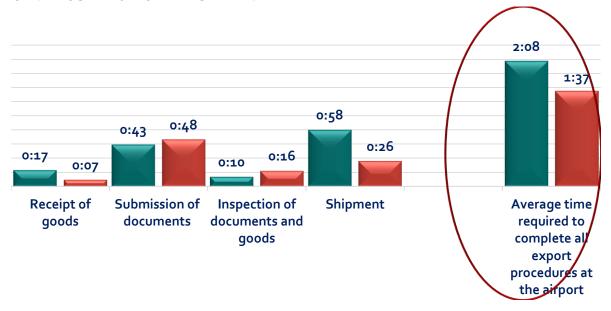
- • The duration of the customs procedure is predominantly affected by three circumstances:
 - Waiting time for documentary control waiting from the moment of submission of documents by a broker to the beginning of processing by the customs authority is on average 60 minutes, which is a consequence of reduced number of customs officers caused by reorganization and general health situation;
 - Waiting time for the physical examination on average 9 hours and 11 minutes elapsed from the moment of notifying a broker about physical examination of the consignment to the beginning of the physical examination. There are two reasons for the amount of time required to complete this procedure. The first reason concerns the working hours during which import clearance is done from 7 a.m. to 2:30 p.m. Namely, the work of the customs service is organized in such a way that physical examinations take place at 8 a.m. for consignments that arrived the day before after 12 noon and which are selected for physical examination. The second round of physical examinations is done at 1 p.m., when the consignments that arrived that day and are selected for physical examination are inspected. Another reason is the number of officers at the customs officers, who are in charge of both passenger and freight traffic, must leave the workplace and stop processing the declarations during the physical examination of consignments at the courier warehouse;
 - The time of actual payment of the customs debt In most cases, the customs debt is secured by a bank guarantee. However, in cases where there were no guarantees (7% cases), the customs debt was paid by bank transfer and the time required for the customs debt to be paid by the importer in the analyzed period was an average of 11 hours and 11 minutes. This is because no payment can be made at the airport since there is no branch bank, and it is necessary that the recipients of consignments go to the city to make bank payments and bring proof of payment to customs officers at the airport.

• Enabling electronic payment for courier services **reduced the average time of dispatch of goods by 82%**. The average time in which a broker notifies the airport or courier cargo service that the customs procedure is completed (from 1 hour and 18 minutes to 52 minutes) is shortened, the time of issue of goods is shortened (from 15 minutes to 5 minutes), and the greatest savings are achieved in issuing invoices and submitting proof of payment to the airport cargo service (from 3 hours to 11 minutes on average).

2.4. AIR CARGO EXPORT

The results obtained from valid questionnaires show that the procedure of exporting goods by air from Podgorica airport takes an average of **1 hour and 37 minutes**, counting the time from filing an electronic declaration and receiving goods for transport by the airport cargo service until the goods leave the warehouse.

Chart 15 Duration and the percentage share of individual activities in the total duration of the procedure of export of goods by air from Podgorica airport



Compared to the average time of 2 hours and 8 minutes measured in 2016 during the first Study, this is an **improvement of 24%**.

Table 10 Duration and the percentage share of individual activities in the total duration of the procedure of export of goods by air from Podgorica airport

	2016		2021		
	Duration	% in total time	Duration	% in total time	
Receipt of goods	17 min	13%	7 min	7%	-59%
Submission of documents	43 min	34%	48 min	50%	+12%
Inspection of documents and goods	10 min	8%	16 min	16%	+60%
Shipment	58 m	45%	26 min	27%	-55%

128 minutes	100%	97 minutes	100%	-24%
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- In the case of exports, the goods must be handed over to the airport ground handling service no later than 3 hours before the flight scheduled for shipping of goods. In practice, consignments may be received every day during the period when the airport is open for aircraft ground handling operations, and the procedure involves the airport security and ground operations, the exporter's broker and the customs authority;
- The greatest improvement, i.e. shortening of time by almost 60%, was achieved in the work of airport services, in the procedure of acceptance of goods by the airport cargo service and inspection of goods by the airport security service. It takes an average of 7 minutes for the airport cargo service to receive the goods and check the documents, and for the security service to inspect the goods. The security service accepts secured baggage that will be monitored until it is loaded on the plane;
- An additional improvement of **55%** was achieved by the airport services in shipping the goods from the warehouse and loading them on a plane. Within a total time of **26 minutes**, the broker notified the airport cargo service that the customs procedure was completed and submitted a loading order, and the cargo service shipped the goods from their warehouse. This result is partly influenced by the reduced traffic at the Podgorica airport, but also by a higher number of customs officers and the organization of the cargo service operations;



Chart 16 Comparative overview of the duration of formalities for goods acceptance and dispatching

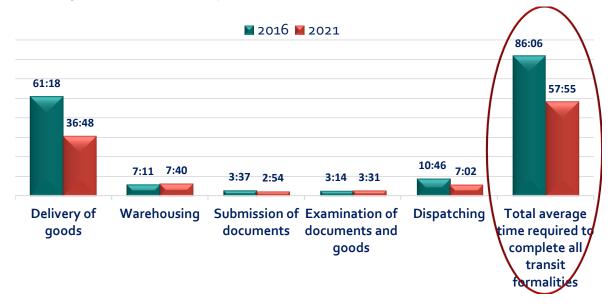
- In the overall process of submitting documents by the brokers, there was a slight increase in time (12%) due to the organization of work. Namely, the electronic declaration is submitted electronically to the customs authority in advance, and only after that the goods are handed over for acceptance to the airport service and the paper declaration and other documents accompanying the goods are submitted to the customs authority;
- The average time for examining the documents and goods by the customs authority was also increased (**78%**). This increase was due to a reduced number of customs officers. Although the very **time of processing** declarations and documents was **reduced by 33%**

(from 9 minutes to 6 minutes), fewer customs officers and the consequent reorganization of work caused an increase in waiting time; namely, the waiting time from the moment of filing the declaration to the beginning of physical examination was 4 minutes on average, and the waiting time from the moment of completing the processing of the declaration and documents until the moment of submitting the documents to a broker was 5 minutes.

2.5. SEA CARGO TRANSIT

Data obtained from valid questionnaires show that the transit of consignments through the Port of Bar took on average **2 days**, **9 hours and 55 minutes**, counting from the time of filing the incoming manifest with the customs authority to the confirmation of the transit declaration, i.e. leaving the customs territory of Montenegro.

Chart 17 Comparative overview of the duration and percentage share of individual activities in the total duration of transit in maritime transport



This average time is **33%** shorter compared to the average time recorded in the 2016 Study, which was **3 days, 14 hours and 6 minutes**.

Duration and percentage share of individual activities in the total duration of transit in maritime transport are given in Table 11.

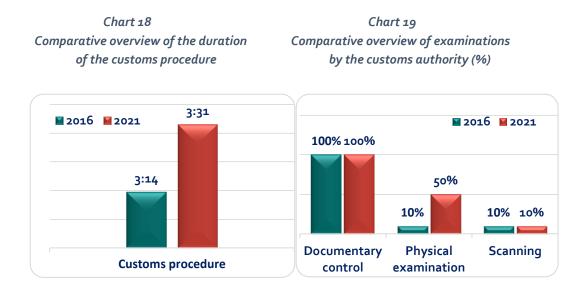
Table 11 Duration and percentage share of individual activities in the total duration of transit in maritime transport

	20	16	20		
	Duration	% in total time	Duration	% in total time	
Delivery of goods	2d 13h 18m	71%	1d 12h 48m	64%	-40%
Temporary warehousing	7h 11m	8%	7 h 40m	13%	+7%

Submission documents Inspection	of of	3 h 37m	4%	2 h 54 min	5 %	-20%
	and	3h 14m	4%	3h 31 min	6%	+9%
Dispatching		10h 46m	13%	7h 2min	12%	-35%
		86 hours 6 minutes	100%	57 hours 55 minutes	100%	-33%

- Although the average time of **delivery of goods is 40% shorter**, this still remains the longest process in the sea cargo transit and lasts on average **1 day 11 hours and 48 minutes**, counting from the moment the incoming manifest is registered with the customs authority. In general, the manifest is submitted by the broker 24 hours before the arrival of the ship. However, there are frequently changes by the carrier resulting in later delivery of a revised manifest. Records of freighters are kept by the customs authorities manually, through customs checks. A certified disposition for operation is submitted to the port operator by the broker on average six hours before the ship's arrival; the ship unloading operation and storing the goods took an average of **12 hours and 12 minutes**. Goods are temporarily warehoused for an average of **7 hours and 40 minutes**;
- It takes on average 2 hours and 54 minutes for a broker to electronically submit the declaration, receive a registration number, prepare documents for customs control and submit paper documents to the authorized customs officer. This time is 20% shorter compared to the time measured in 2016 when the same formality lasted on average 3 hours and 37 minutes;
- **Customs clearance** of transit consignments on average lasted for **3 hours 31 minutes**. This period includes waiting from the time of submission of customs documents by the broker to the beginning of the control, documentary check, waiting for scanning and scanning, physical examination, verification and separation of documents and returning documents to the broker. The customs procedure lasted for **16 minutes** in total, **i.e. 9% longer** than during the 2016 measurement. However, one should bear in mind that compared to the previous measurement, the number of officers customs officers and customs inspectors at the CO Free Zone Bar was reduced by 50%. In addition, each shift is additionally affected due to the fact that one person has to remain at the gate of the Free Zone at any time and cannot participate in the procedure of releasing goods. Despite all the above limitations, the organization of the work process led to a reduction in the waiting time from the submission of documents by a broker to the beginning of the physical examination by 44% (from 34 minutes to 19 minutes);

• The average duration of the customs procedure is most significantly affected by the waiting time for scanning. The scanning lasted for **12 minutes** on average, however, the average waiting time to get a scan done, i.e. the time from selecting a consignment for scanning until the scanning started amounted to **21 hours 19 minutes**. This is **3% longer** waiting time compared to the measurement in 2016, when it lasted for 20 hours and 36 minutes. In the meantime, the customs authority obtained a new scanner and eliminated the limitations related to the waiting time due to mechanical causes or frequent scanner failures. However, of the total number of employees at the CO Free Zone Bar, only three have a health certificate to operate a scanner. During the measurement, **10%** of shipments were sent for scanning, but due to the mentioned problems, risk management caused an increase in the percentage of physical examinations from **10%** to **50%**.



Upon completion of the customs procedure, transit consignment was sent to the exit customs office. The average time of shipment, from the completion of customs formalities to leaving the customs territory of Montenegro, in the analyzed period, amounted to 10 hours 46 minutes. The total duration of this phase was most affected by situations in which reloading was necessary (1 hour 40 minutes) and cases where it was necessary to obtain a permit for the transport of oversized loads that were subject to certain legal restrictions related to the dimensions of cargo, the manner in which the cargo could be transported, the transport route on which the vehicle was moving, as well as the time of day when transport was allowed.

ANNEX - TRS QUESTIONNAIRES

	TIME RELEASE QUESTIONNAIRE FOR ROAD CARGO IMPORT PROCEDURE BCP DOBRAKOVO – INAND TERMINAL PODGORICA										
		-						dures of importing and exporting			
-							corrective	measures may be undertaken.			
Ihan	k you for your partic				equired to releas						
	ACTIVITY Day/month Hour/minute										
TRU	TRUCK ARRIVAL AT BORDER CROSSING – TO BE COMPLETED BY THE FREIGHT FORWARDER										
1	Arrival at the BCP					/		;			
2	Documents hand c	ver				/		:			
INTE	INTERVENTION (if applicable) – TO BE COMPLETED BY THE COMPETENT AUTHORITY										
3	Goods subject to					Relevant	authority	1			
	Intervention – to	NO	YES				Other				
	be completed by the forwarder										
4	Date and time of s	ubmitt	ting the	application for int	ervention	/		;			
5	Intervention starte	d				/		;			
6	Intervention endec	;		,		/					
7	Date and time the	report	: is prep	ared		/	:				
8	Date and time of d	eliveri	ng the r	report to the forwa	arder	··					
BOR	DER POLICE CONT	ROL –	TO BE	COMPLETED BY	BORDER POLI	CE OFFICEI	R				
9	Border police cont	rol sta	rted			/					
10	Border police cont	rol enc	ded			/		<u>;</u>			
INSP	ECTION AUTHORI	гү со	NTROL	. (if applicable) - T	O BE COMPLE	TED BY TH	E INSPEC	TOR			
11	Goods subject to				Rele	evant inspe	ction aut	hority			
	inspection – to	NO	YES	□Veterinary	□Sanitary	□Phyto		······			
	be completed by										
	the forwarder										
12	Date and time of s	ubmit	ting the	application for go	ods control	/		:			
13	Checking the			14. Date and ti	ime checking	/		;			
	documents and identifying the	NO	YES	started 15. Date and ti	ime checking	1					
	goods			ended	ппе спескіну	/		· ·			

16	Physical			17. Date and time physical	1	
10	examination			examination started	/	··
	examination		_		1	
		NO	YES	18. Date and time physical examination ended	/	··
10	Sampling			20. Date and time of sampling	1	
19	Sampling	□ NO	□ YES	21. Date and time of obtaining	/	··
		NU	TES	the findings	/	·i
22	Date and time the	incnar	tor's de	5	1	
22		•		decision to the forwarder	/	··
23			-		/	⁻
ELEC	TRONIC AND HAR	D COF	Y SUB	MISSION OF DOCUMENTS - TO	BE COMPLETED BY	THE FORWARDER
24	Date and time of e	lectro	nic subr	nission of SAD	/	:
25	Date and time of re	eceivir	ng the R	RP/RG (registration no.)	/	<i>:</i>
26	RRP/RG no.					
27	Date and time o	f subr	mittina	hard copy documents to the	1	
2/	customs authority	1 5001	intening	hard copy docoments to the	/	··
	,			D GOODS - TO BE COMPLETED		
EAAI		UWER				
28	Date and time the	exami	nation	of documents started	/	;
29	Additional			30. Date and time of notifying	/	·=
	documents	NO	YES	the forwarder to provide		
				additional documents		
				31. Date and time of supplying	/	;
				additional documents		
32	Date and time the	exami	nation	of documents is completed	/	·;
33	Weighing			34. Date and time of weighing	/	;
		NO	YES			
35	Physical			36. Date and time physical	/	;
	examination	NO	YES	examination started		
				37. Date and time physical	/	;
				examination ended		
38	Affixing the			39. Affixing the customs seal	/	·;
	customs seal	NO	YES	started		
				40. Affixing the customs seal	/	·:
				ended		
41	Releasing goods		In	□Interna transit – Customs	□ Free circulation	
		hous		Office Terminal Podgroica		
			ance			
		4	.2. Date	and time of releasing goods	/	
NOT	E					

ARR	IVAL AT TERMINAL PODO	ORICA	– TO BE	COMPLETED BY T	THE FORWAR	RDER			
43	Date and time of vehicle e	ntering	terminal				/	. [;	
CUS	TOMS CONTROL - TO BE	COMPL	ETED BY	THE CUSTOMS O	FFICER				
44	Shipper delivers the docur	Shipper delivers the documents to the forwarder- to be completed by the forwarder							
45	Checking the vehicle and			46. Date and time	checking sta	rted	/	.	
	seal	NO	YES	47. Date and time	checking end	led	/	:	
48	Confirmation of transit do	cument	<u>.</u>				/		
INSF	PECTION AUTHORITY CON	NTROL	(if applic	able) - TO BE COM	PLETED BY	THE INSPEC	TOR		
49	Goods subject to				Relevar	nt inspection	authority		
	inspection – to be completed by the forwarder	NO	YES	□Veterinary	□Sanitary		□Phyto	□	
50	Date and time of submittin	ng the a	pplicatio	n for goods control			/	:	
51	Checking the			52. Date and time	checking sta	rted	/	;	
	documents and identifying the goods	NO	YES	53. Date and time checking ended		/	:		
53	Physical examination	□ NO	□ YES	54. Date and tim started	54. Date and time physical examination started		/	:	
				55. Date and tim ended	ne physical e	xamination	/		
56	Sampling			57. Date and time			/		
50	Date and time the inspecto	NO orís doci	YES	58. Date and time	of obtaining t	the findings	/		
59 60	Date and time of delivering		-				/	·	
	ERVENTION (if applicable)	5			MPETENT AL	JTHORITY	/	· · · · · · · · · · · · · · · · · · ·	
61	Goods subject to					elevant auth	ority		
	Intervention – to be completed by the forwarder	NO	YES			CM	0	ither	
62	Date and time of submittir	ng the a	pplicatio	n for intervention			/	:	
63	Intervention started						/	:	
64	Intervention ended						/		
65	Date and time the report is	s prepar	red				/	:	
66	Date and time of delivering	g the re	port to th	1e forwarder			/		
ELE	CTRONIC AND HARD COP	Y SUBN	NISSION	OF DOCUMENTS	-TO BE COM	PLETED BY	THE FORWA	RDER	
67	Date and time of electroni	c submi	ssion of S	SAD			/		

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68	Date and time of receiving	g the RRP	P/RG (reg	jistration no.)	/	:
69	RRP/RG no.					. .
70	Date and time of submitti	ng hard c	opy doc	uments to the customs authority	/	:
EXA	MINATION OF DOCUMEN	ITS AND	GOOD	5 - TO BE COMPLETED BY THE CUSTOMS C	OFFICER	
71	Date and time the examin	ation of o	docume	nts started	/	:
72	Additional documents	□ NO	□ YES	73. Date and time of notifying the forwarder to provide additional documents	/	:
				74. Date and time of supplying additional documents	/	:
75	Date and time the examin	ation of o	docume	nts is completed	/	:
76	Weighing	□ NO	□ YES	77. Date and time of weighing	/	:
78	Physical examination	□ NO	□ YES	79. Date and time of notifying the forwarder about the examination	/	;
				80. Date and time physical examination started	/	:
				81. Date and time physical examination ended	/	·:
82	Method of payment			□Cash	🗆 Bank	guarantee
				83. Date and time invoice is paid	/	:
84	Verification of documents	5			/	i
85	Delivery of the document	s to the fo	orwarde	r –to be completed by the forwarder	/	:
DISF	PATCHING – TO BE COMF	PLETED E	BY THE	TERMINAL EMPLOYEE		
86	The forwarder submits the	e docume	entation	to the carrier	/	:
87	The carrier leaves the terr	ninal and	gives th	e questionnaire to the terminal employee	/	:
ΝΟΤ	TE					

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	TIME RELEASE QUESTIONNAIRE FOR ROAD CARGO EXPORT PROCEDURE INLAND TERMINAL PODGORICA- BCP DOBRAKOVO								
good	The Government of Montenegro decided to carry out analysis of the time needed for procedures of importing and exporting goods. The purpose of the analysis is to identify obstacles in the procedures so that corrective measures may be undertaken. Thank you for your participation in measuring the time required to release goods!								
			АСТ	ΙVΙΤΥ	Day/month	Hour/minute			
ARR	IVAL AT TERMINAL POD	GORIC	A – TO	BE COMPLETED BY THE FORWARDER					
1	Date and time of vehicle	enterir	ng termi	inal	/	:			
ELE	CTRONIC AND HARD COP	PY SUE	MISSIC	ON OF DOCUMENTS -TO BE COMPLETED BY T	HE FORWARD	ER			
2	Date and time of electro	nic sub	mission	of SAD	/	÷			
3	Date and time of receivir	ng the F	RG (regi	stration no.)	/				
4	RG no.								
5	Date and time of submit	ting ha	rd copy	documents to the customs authority	/	;			
EXA	EXAMINATION OF DOCUMENTS AND GOODS - TO BE COMPLETED BY THE CUSTOMS OFFICER								
6	Date and time the examin	nation o	of docur	nents started	/	;			
7	Additional documents	□ NO	□ YES	8. Date and time of notifying the forwarder to provide additional documents	/	·:			
				 Date and time of supplying additional documents 	/	;			
10	Date and time the examin	nation o	of docur	nents is completed	/	÷			
11	Weighing	□ NO	□ YES	12. Date and time of weighing	/	:			
13	Physical examination	□ NO	□ YES	14. Date and time of notifying the forwarder about the examination	/	;			
				15. Date and time physical examination started					
				16. Date and time physical examination ended	/	:			
17	Affixing customs seal		1	1	/	;			
18	Certifying and separating	docum	ents		/	;			
19	Returning document to th	ne forw	arder		/	:			
DISF	PATCHING GOODS – TO E	BE COM	IPLETE	D BY THE FORWARDER AND TERMINAL EMPI	OYEE				
20	Documents delivered to d	lriver fo	or referr	al to border customs office	/	:			
21	The carrier leaves the terr given back to the driver)	minal a	nd heac	ls to the BCP CI Dobrakovo (questionnaire to be	/				
NOT	Ъ.								

22	Arrival at the BCP	Arrival at the BCP						
23	Delivering documents to	customs off	icer		/	:		
24	Start of documentary cor	ntrol by cust	oms offi	cer	/			
25	End of documentary cont	trol by custo	ms offic	er	/	;		
26	Weighing	□ NO	□ YES	27 Date and time of weighing	/	:		
28	,	nysical examination		29. Date and time physical examination started	/	·:		
				30. Date and time physical examination ended	/	:		
31	Discharging transit SAD				/	:		
BOF	RDER POLICE CONTROL -	ТО ВЕ СОМ	PLETED	BY BORDER POLICE OFFICER				
32	Border police control star	rted			/	;		
33	Border police control con	npleted			/	;		
NO	ΓE				:			

	TIME RI	ELEAS	PODG	TIONNAIRE FOR AIR CARGO IMPORT PRC ORICA AIRPORT CUSTOMS OFFICE r for goods of a commercial nature)	OCEDURE	
goo	ds. The purpose of the analysi	is is to i	ed to car dentify o	ry out analysis of the time needed for proceed to proceed the procedures so that corrective e time required to release goods!		5 . 5
			ACTIVI	TY	Day/month	Hour/min
AIR	PLANE LANDING - TO BE CC	MPLE	TED BY	PODGORICA AIRPORT REPRESENTATIVE	:	
1	Date and time of airplane la				/	;
2	Flight number	5				
3	Date and time cargo unload	ing sta	rted		/	:
4	Date and time cargo unload	ing end	ded		/	:
5	Control by customs officer			6. Date and time control started	/	:
	during unloading	□ NO	□ YES	7. Date and time control ended	/	:
WA	REHOUSING - TO BE COMP	LETED	BY AIR	PORT REPRESENTATIVE AND COMPETEN	IT CUSTOMS OFF	ICER
8	Date and time the storing o	/	;			
9	Date and time the storing o	/	:			
10	Date and time of preparing	/	;			
11	Date and time of submissi authority	on/rep	orting o	f the summary declaration to the customs	/	·:
12	Date and time the summary	/ declar	ation pr	ocessing started	/	
13	Date and time of certifying	the sun	nmary d	eclaration and assigning ID number	/	:
14	Date and time of notifying o	consign	ee		/	:
15	Date and time the forwarde	r takes	overthe	documents	/	:
NO INS 16		TROL (<mark>if applic</mark> U YES	able) - TO BE COMPLETED BY THE INSPEC Relevant inspectio		

17	Date and time of submitting	j the ap	plicatior	ι for goods control		/_		:
18	Checking the			19. Date and time checkir	ng started	/_		:
	documents and	NO	YES	20. Date and time checkir	ng ended	/_		·;
21	identifying the goods Physical examination			22. Date and time phys	ical examination			
~-	- Hysical couring ton			started		/_		·
		NO	YES	23. Date and time phys	ical examination	/_		;
	-			ended				
24	Sampling			58. Date and time of sam				·;
דכ	Date and time the inspector	NO 1's decisi	YES	58. Date and time of obtain	ining the findings	///_/		·:
27 28	Date and time of delivering			•		/_ /		··
	ERVENTION (if applicable) –				NT AUTH <u>ORITY</u>			
	Goods subject to		·		Competent aut	hority		
29	Intervention – to be	⊔ NO	∐ YES		•	ioncy		
	completed by the						□Other	
	forwarder							•
30	Date and time of submitting	/_		:				
31	Intervention started	/_		;				
32	Intervention ended	/_		:				
33	Date and time the report is p Date and time of delivering		//_/		;;			
34 EL E	CTRONIC AND HARD COPY				COMPLETED BY T		WARDER	·
35	Date and time of electronic s					<i>_</i>		:
36	Date and time of receiving the	ne RG (r	egistrat	ion no.)		/_		:
37	RG no.			-				
38	Date and time of submitting	hard co	py docu	Jments to the customs auth	nority	/		:
EXA	MINATION OF DOCUMENT	SAND	GOODS	- TO BE COMPLETED BY	THE CUSTOMS O	FFICER		
39	Date and time the examinat	ion of d	ocumer	its started		/		:
40	Additional documents			41. Date and time o	f notifying the	/_		;
				forwarder to provi	ide additional			
		NO	YES	documents	ما بنوم مطوله:			
				42. Date and time of sup documents	piying additional	/_		[;]
43	Date and time the examinat	ion of d	locumer			/		:
44	Physical examination			45. Date and time o	f notifying the	/		;
	,			forwarder about the exar	, 0			
		NO	YES	46. Date and time phys	ical examination	/_		:
				started	teel en in ti			
				47. Date and time phys ended	ical examination	/_		:
	1 · · · · · · · · · · · · · · · · · · ·	1	1					4

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48	Method of payment	□Cash	🗆 Bank g	uarantee						
		49. Date and time invoice is paid	/	:						
50	Date and time of certifying and separating	documents	/	;						
51	Date and time of delivering the document	/	;							
DIS	DISCHARGE FROM WAREHOUSE - TO BE COMPLETED BY PODGORICA AIRPORT OFFICER									
52	Forwarder notifies Podgorica airport office	/	;							
53	Date and time of issuing the invoice for wa	rehousing costs	/	;						
54	Date and time of submitting proof of payn	nent	/	;						
55	Date and time the loading of goods started	d	/	;						
56	Date and time the loading of goods ended		/	;						
57	Date and time of leaving the airport		/	;						
NO	NOTE									

TIME RELEASE QUESTIONNAIRE FOR AIR CARGO EXPORT PROCEDURE PODGORICA AIRPORT CUSTOMS OFFICE

The Government of Montenegro decided to carry out analysis of the time needed for procedures of importing and exporting goods. The purpose of the analysis is to identify obstacles in the procedures so that corrective measures may be undertaken.

Thank you for your participation in measuring the time required to release goods!

	ACTIVITY	Day/month	Hour/min
	EIVING GOODS PODGORICA AIRPORT FOR THE WAREHOUSE–T RESENTATIVE	O BE COMPLET	ED BY AIRPORT
1	Delivery of goods to Podgorica Airport intended for export	/	;
2	Control of documents and goods by ground handling agent	/	;
3	Start of security service control	/	;
4	End of security service control	/	:
SIM	PLIFIED PROCEDURE - TO BE COMPLETED BY THE CUSTOMS OFFICE	R	
5	Simplified procedure	□ NO	□ YES
6.	Date and time of submitting hard copy SAD and documents to customs	/	;
7	Date and time the examination of documents started	/	;
8	Date and time the examination of documents ended	/	
9	Date and time of making documents and goods available to the	·/	;
	forwarding service		
	ULAR PROCEDURE - ELECTRONIC AND HARD COPY SUBMISSION OF THE FORWARDER	DOCUMENTS- T	O BE COMPLETED
ы 10	Submission of electronic SAD	1	÷
11	Date and time of receiving the RG (registration no.)	/	
12	RG no.		
13	Date and time of submitting hard copy documents to the customs	/	:
	authority		
EXA	MINATION OF DOCUMENTS AND GOODS - TO BE COMPLETED BY TH	HE CUSTOMS OF	FICER
14	Date and time the examination of documents started	/	÷
15	Additional documents 🛛 🖾 16. Date and time of notifying	İ/	·:
	NO YES the forwarder to provide		
	additional documents 17. Date and time of supplying	1	
	additional documents	/	
18	Date and time the examination of documents is completed	/	·:

:										
:										
:										
:										
÷										
DISPATCHING GOODS - TO BE COMPLETED BY RELEVANT OFFICER OF PODGORICA AIRPORT										
:										
÷										
:										
÷										
ΝΟΤΕ										
-										

TIME RELEASE QUESTIONNAIRE FOR SEA CARGO TRANSIT PROCEDURE CUSTOMS OFFICE FREE ZONE BAR										
expo may	The Government of Montenegro decided to carry out analysis of the time needed for procedures of importing and exporting goods. The purpose of the analysis is to identify obstacles in the procedures so that corrective measures may be undertaken. Thank you for your participation in measuring the time required to release goods!									
		Day/month Hour/min								
SUBMISSION OF GOODS -TO BE COMPLETED BY THE CUSTOMS OFFICER										
1	Registration of incomin	g man	ifesto				/		:	
2	Container no.									
3									:	
4 Unloading stared								/:::		
5	Unloading ended		/							
INSPECTION AUTHORITY CONTROL (if applicable) - TO BE COMPLETED BY THE INSPECTOR										
6	Goods subject to				authori	ty				
	Intervention – to be completed by the forwarder	NO	YES	□ Veterinary	□Sa	nitary	□Phy	to]	
7	Date and time of submi	tting t	he app	lication for goods con	trol		/	i	:	
8	Checking the			 9. Date and time checking started 					:	
	documents and identifying the goods	NO	YES	10. Date and time checking ended			/	· · · · · · · · · · · · · · · · · · ·	·:	
11	Physical examination			12. Date and time physical examination started						
		NO	YES	13. Date and time physical examination ended			/			
14	Sampling			15. Date and time of sampling					·:	
		NO	YES	16 Date and time of obtaining the findings			/			
17	Date and time the inspe	ector's	decisic	n is prepared	/		:			
18	Date and time of delive	ring th	e decis	ion to the forwarder			/		:	
INT	ERVENTION (if applicab	ole) – T	OBEO	OMPLETED BY THE	COM	PETENT AUTHO	ORITY			
19	Goods subject to	□ NO			nority					
	Intervention – to be		YES				□Other			

		,			······				
	completed by the forwarder								
20	Date and time of submi	/	:						
21	Intervention started	/	:						
22	Intervention ended	/	:						
23	Date and time the repo	/	:						
24	Date and time of delive	/							
ELE	LECTRONIC AND HARD COPY SUBMISSION OF DOCUMENTS- TO BE COMPLETED BY THE FORWARDER								
23	Submission of electronic	/	<i>:</i>						
24	Receiving RRP no.		/	:					
25	Date and time of submit	he customs authority	/	:					
EXA	EXAMINATION OF DOCUMENTS AND GOODS - TO BE COMPLETED BY THE CUSTOMS OFFICER								
26	Date and time the exam	/	·:						
27	RG no.								
28	Additional documents			29. Date and	time of notifying the	/	:		
				forwarder to	provide additional				
		NO	YES	documents					
				-	e of supplying additional	/	:		
				documents	- + 1				
31	Date and time the exam	iinatic	n of ac			/	:		
32	Scanning			33. Scanning star		/			
25	Physical avamination	NO	YES	34. Scanning star	36. Date and time of	/	i		
35	Physical examination			with port operator	submitting disposition	/	²		
		NO	YES	operator	for operation				
			. 23		37. Examination	/	:		
					started				
					38. Examination ended	/	:		
				without port	39. Notifying the	/	:		
				operator	forwarder				
					40. Examination				
					started				
	Affiving customs cool	41. Examination ended	/	:					
42 72	Affixing customs seal	na doc	ument			/	²		
43	Certifying and separating documents								
	44 Returning document to the forwarder								
DIS	DISPATCHING GOODS - TO BE COMPLETED BY RELEVANT PORT OFFICER								

45	Disposition for			46 Date and time of submitting	/	:	
	operation			disposition for operation			
		Ν	Ye	47. Loading started	/	:	
		0	S	48.Loading ended	/	;	
49	Date and time of leaving the terminal						
50	Discharging transit SA	/	:				
NOTE					•		